
Evaluation of PA hazards working strategies in the EU Baltic Sea strategy

Gunilla Björklund
Lina Lenefors
Arne Svensson



Company/Registration no./VAT no.

Professional Management
Arne & Barbro Svensson AB
SE556534118601

Illervägen 27
SE-187 35 TÄBY

Address/Address

08-792 38 28
+46 8 792 38 28

Telephone

Email/Website

svensson@professionalmanagement.se
www.professionalmanagement.se

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1 Summary

The Swedish Environmental Protection Agency (SEPA) ¹ has engaged Professional Management AB to carry out an evaluation of PA Hazards' (Policy Area Hazardous Substances) working strategies within the EU Baltic Sea strategy. The purpose of the assignment is to evaluate the impact and results of PA Hazards' working strategies, followed by recommendations for developing and improving the work.

In the evaluation report we presented how PA Hazards' work in the EU Baltic Sea strategy was developed and the results that have been achieved. Based on an analysis of the material collected we drew certain conclusions and provided concrete recommendations for serious consideration.

At the heart of PA Hazards' organisation is its relationship to the objectives of the EU strategy for the Baltic Sea region (EUSBSR), relevant policy frameworks and conventions as well as current scientific and technical knowledge and advances. It's against this background that PA Hazards works with its prioritised issues and activities.

Our analysis of PA Hazards' working strategy shows that there has been a continuous development of working methods and processes. The Baltic Sea Strategy is a relatively new collaborative approach in the EU, that seeks to achieve results by focusing on efforts and resources towards priority areas. The strategy is still under development, which means the work must be constantly adapted to new conditions. At the same time, it's also possible to influence development and contribute to new solutions and forms of collaboration.

In our opinion, work on the strategic plan has proceeded well, and the same approach should also apply to the upcoming period. Following consideration by the steering group, the priorities seek grassroots support in the countries concerned. The strategic plan also provides practical guidance for the Policy Area Coordinator (PAC) and other key people within PA Hazards.

Our analysis of the results and the impacts achieved during the period 2013-2017 show clear links to the issues especially spotlighted by flagship projects. The flagship projects address these issues in depth and scientific institutions are often represented among the parties. Furthermore, many of the Baltic States are represented at the policy level. This provides good conditions for the projects to present reports founded on a solid scientific basis, but which at the same time provide relevant data for the preparation of decision support material at policy level.

While PA Hazards has a good foundation for its work through its links to the European Commission, HELCOM, and the PA Hazards steering group, the foundation needs to be strengthened so that it works better in practice. Among other things, there is a need to develop existing structures in several countries in the region and their institutions. There are major differences between participating countries when it comes to interests, mandates and resources. However, it's difficult for PA Hazards to influence these factors as an organisation; it's more about the ability of individual steering group members to drive change on their home turf, and the Commission's abilities to influence the member states. Neither PA Hazards as a whole nor the PAC have any formal mandate in respect of the individual countries in the collaboration or the institutions involved in these countries (or *not* involved, but whose participation would be desirable).

Even though PA Hazards is formally subordinate to EUSBSR, the latter is not an organisation in the same way as e.g. HELCOM is, but is a strategy developed and adopted by the EU Commission. Naturally, such an approach – which applies to all countries around the Baltic Sea – must to a certain extent govern work at the political level in each country. But there is no specially defined group to act as PA Hazards'

¹ The abbreviations are listed in Annex 4.

counterparty in discussions with the EU. The EU is represented in PA Hazards work by DG Environment and DG Regio, and these units have far too many other areas on their desks for there to be any realistic possibility of building a partnership strong enough to improve the conditions for policymaking at the political level. It is therefore primarily a matter of priorities within the EU.

In light of our analysis and our conclusions, we present the recommendations below (in the order they are listed in the report). The recipient of the evaluation is the PA Hazards steering group. Thus the steering group has to consider the extent to which the recommendations should lead to action and, if so, which measures are appropriate. The steering group must also decide who should perform each action. We have highlighted in bold those cases where we believe it to be within PAC Hazards' remit to implement measures. As for the other recommendations, we believe PAC Hazards is able to initiate actions, but that implementation is also dependent on other players, such as the Government Offices of Sweden.

Recommendations:

- ***Make sure the minutes from the steering group meetings are drawn up according to a template so that the same type of information is provided by the meetings and that resolutions are clearly shown.***
- ***The minutes from the steering group meetings should include a follow-up to ensure all of the resolutions adopted at the previous meeting are actioned.***
- ***Easily accessible information about flagship projects and their results and PA Hazards in general are crucial for achieving the intended effects. Ensure that results are made visible through published reports, which are available or easily searchable via the website.***
- Also to work ***together with other operators*** in the upcoming flagship projects to ensure that the balance between the scientific and policy approaches is such that they reinforce each other's positive aspects both in reporting and in the conditions provided to enable the use of project results in policy development.
- ***By providing concrete, well-supported information ensure that the steering group members enjoy the best possible conditions for fulfilling their commitments.***
- ***Undertake road shows, in accordance with the concept drawn up.***
- ***Ensure an active exchange of information between the Government Offices of Sweden and PA Hazards.*** This collaboration should continue to be a top priority, where opportunities for deeper cooperation are taken. The exchange of information should not only seek to keep Government Offices up to date on developments in policy related issues to facilitate decisions that involve a change in policy direction stemming from the work of PA Hazards and its results, but also to keep PAC updated with regard to the policy agenda.
- To continue to develop and make use of the links between the work in PA Hazards and HELCOM to achieve synergies at the policy level. HELCOM has a legal structure that also provides the tools for policymaking at the political level for PA Hazards.
- ***In general, increased opportunities for participation are created using communication technologies in the different types of meetings organised within PA Hazards to increase attendance. Experiences from the web-based steering group meetings should be put to use in this context.***
- ***PA Hazards should identify and communicate ideas linked to innovation, funding and investments as a complement to the projects, as project funding is not sustainable.***
- ***The successful concept used in the development of the pharmaceutical platform should also be used in other areas, where similar working conditions pertain or can be created.***

- ***Update and concretise the document that describes what the flagship projects are, the expectations placed on future flagship projects and what they can expect from PA Hazards.***
- Baltic Sea cooperation should be given higher priority within the Government Offices of Sweden and at the Swedish Environmental Protection Agency.
- KemI and HaV [Chemicals and the Swedish Agency for Marine and Water Management] should be given a clear assignment in the letter of authorisation (and funding) as regards involvement by national authorities in PA Hazards. This is a necessary condition if their efforts are to enjoy the influence their content justifies.
- It's important that the government's planned national network for the partial Baltic Sea strategy objective 'Save the Marine Environment' be given a stable form and structure and that conditions are provided for stronger links to the EU Marine Strategy Framework Directive and the EU Water Framework Directive.
- ***At the beginning of the next three-year period, the PA Hazards steering group should hold a reflection seminar for the presentation of results thus far and discussions concerning future priorities with additional interested parties invited from the countries concerned, and broad participation from Swedish civil authorities, researchers and flagship projects.***
- ***The three-year plan for PA Hazards should be given the distinct character of a strategic plan, with details concerning implementation set out in annual work plans.***
- ***PA Hazards should explore opportunities to expand resources for policy coordination at SEPA from 1.5 to 2.0 full-time positions, among other things to increase initiatives within strategic development, dissemination of results and the implementation of a reflection seminar and road shows.***

2 The assignment and its implementation

2.1 The assignment

The Swedish Environmental Protection Agency (SEPA) has engaged Professional Management AB to carry out an evaluation of PA Hazards' working strategies within the EU Baltic Sea strategy. A description of the assignment and a requirements specification is available in Annex 1.

The assignment was conducted during the period September 2017 through January 2018 by Lina Lenefors, Gunilla Björklund and Arne Svensson. The evaluation assignment work covers a total of five weeks evenly distributed between the three evaluators.

The assignment's contacts at the Swedish environmental protection agency were Jenny Hedman, Jeanette Häggrot and Maxi Nachtigall.

2.2 Background

The Swedish Environmental Protection Agency was tasked by the government to actively contribute to the implementation of the EU Strategy for the Baltic Sea Region (EUSBSR or Baltic Sea Strategy) during the period November 2011 to January 2015. A second government assignment was given for the period 2013-2017, and a third assignment covers the period 2015-2020. The latter two assignments are not only extensions of the first. For example, in the latest assignment, an earlier text concerning the Swedish Chemical Agency's responsibility to assist was removed².

The Baltic Sea strategy is the first macro-regional strategy in Europe; it aims to increase cooperation and mobilise EU support and resources to meet the common challenges the countries of the Baltic Sea region face today. In accordance with the updated EU Baltic Sea strategy action plan³, which comprises 13 policy areas and 4 horizontal measures, it stresses the importance of links to both the Marine Directive (MD) and the Water Framework Directive (WFD). The Baltic Sea environment is especially vulnerable when it comes to emissions of hazardous substances and waste, which is reflected in the PA Hazards programme. The action plan stresses the importance of achieving good environmental status in the Baltic Sea by 2020 in accordance with the Marine Directive and related objectives according to the HELCOM Baltic Sea Action Plan (BSAP) to achieve a good ecological status by 2021.

The strategy has three main objectives: Saving the marine environment, Connecting the region and Increasing prosperity. Objectives will be achieved through actions and projects split into thirteen policy areas and the four horizontal measures.

The Swedish Environmental Protection Agency works on Sweden's behalf in Policy Area Hazards with the aim of reducing the use and release of hazardous substances into the Baltic Sea. This means Sweden has the role of coordinator and Chair of PA Hazards. The various tasks where SEPA represents Sweden are set out in the Strategy for the Baltic Sea Region, where Chapter 2 deals with the roles and responsibilities of the parties implementing the strategy.

² A government decision dated 13/10/2011 on the 'Assignment to participate in the implementation of the EU Strategy for the Baltic Sea region and its action plan' states that 'the Environmental Protection Agency will lead the work of the priority area of reducing the use and the impact of hazardous substances in accordance with the action plan for the EU strategy for the Baltic Sea region. This must take place in close cooperation with the Swedish Chemicals Agency.'

³ Action plan for the European Union Strategy for the Baltic Sea Region, 20/03/2017

The overall objectives of Policy Area Hazards are the same as those for hazardous substances set by HELCOM, i.e. (i) the concentration of hazardous substances must be close to the natural level; (ii) that all fish must be safe to eat, and (iii) healthy animal life. In addition, there are certain specific action plan objectives and indicators for PA Hazards to follow up⁴.

2.3 Assignment objective

2.3.1 The assignment's objective

Evaluation of the impact and results of PA Hazards' working strategies, followed by recommendations for developing and improving the work.

The evaluation will form the basis for an application for support from the Interreg Baltic Sea programme for PACs implementation of its respective areas within the Baltic Sea strategy in the early spring of 2018.

2.3.2 The evaluation's goals

The evaluation's goals are

- Evaluation of the work within PA Hazards, and its results and impacts during the period 2013-2017
- The development of recommendations for the future scope and direction of PA Hazards work from 2018 onwards.
- To make proposals for necessary revisions of the working strategy
- To make proposals for recommendations on how relevant results from PA Hazards work including results from flagship projects can be implemented.

2.4 Implementing the assignment

Data collection in the assignment has been carried out by semi-structured interview and reviews of documentation⁵. As far as possible, results are validated by triangulating⁶ the information.

A list of people interviewed is available in Annex 2. Also, a number of people were contacted who declared they did not wish to be interviewed (including from DG Environment, HaV and the Swedish Ministry of the Environment). The generic, semi-structured interview guide used in all interviews is attached as Annex 3.

2.5 Report outline

The report outline follows the questionnaire and structure in the assignment description we were given. Chapter 1 summarises the results of the evaluation. The assignment and its implementation are described in Chapter 2. Chapter 3 provides a brief description on SEPA's work within the Baltic Sea strategy concerning PA Hazards. This is followed in Chapter 4 by an evaluation of plans and the impact of the work within PA Hazards. Dissemination of information and the communication of results are addressed in Chapter 5, and implementation in Chapter 6. Finally, PA Hazards' overall strategy and

⁴ "PA Hazards – Reducing the use and impact of hazardous substances", pages 95-100 in the Action plan for the European Union Strategy for the Baltic Sea Region, 20/03/2017

⁵ Documentation reviewed includes: Action plans and strategy documents; accounting documents regarding financial issues and a number of applications; documentation regarding the government assignments; reports from steering group meetings; reports from workshops and documents available on the Internet.

⁶Triangulation Involves looking at a problem from several viewpoints. A typical example would be to interview people with different relationships to a problem you seek to validate.

approach are analysed and recommendations made concerning the future design, scope and direction of PA Hazards work from 2018 onwards.

3 SEPA's work within the Baltic Sea strategy concerning Hazardous Substances

3.1 SEPA's work within the EU Baltic Sea strategy

SEPA has been tasked (2016-2020) by the government to actively contribute to the implementation of the EU Strategy for the Baltic Sea Region (EUSBSR or Baltic Sea Strategy)⁷. The scope of this work includes work within PA Hazards. The Baltic Sea Strategy is the first macro-regional strategy in Europe; it aims to deepen collaboration between countries and mobilise EU support and resources. The EU Member States included in the strategy are Sweden, Denmark, Germany, Poland, Lithuania, Latvia, Estonia and Finland. The strategy also encourages collaboration between neighbouring countries in the region such as Russia, Belarus, Norway and Iceland.

The European Commission is responsible for strategic coordination and strategy development. The member countries of the Baltic Sea Strategy bear political responsibility and provide leadership. Each of the thirteen policy areas is coordinated by one or more policy area coordinators (PACs), who perform a key implementation function by leading the work forward within their areas of responsibility in close consultation with the stakeholders concerned.

On 14/01/2016, the Swedish government resolved that *"The Environmental Protection Agency must appoint a policy coordinator for the hazardous substances policy area. The policy coordinator must carry out his assignment in compliance with the guidelines in the commission's action plan. In representing Sweden in this coordination work, the policy coordinator has the support of the Government Offices of Sweden"*⁸

SEPA has an activity plan for EU Baltic Sea strategy work in 2017, which is the second plan in order. While the purpose of the activity plan is to describe SEPA's work in the EU Baltic Sea strategy for 2017, the main reason a second activity plan was drawn up in 2017 was that the coordination function for PA Hazards was moved from the National Policy Instruments unit to the EU unit during 2015. The 2017 activity plan also illustrates the reinforcement of efforts through the employment of an additional staff member.⁹

Implementation issues and supervision of compliance with EU directives and legislation on chemicals are priority areas.

An overview timeline for the period the evaluation concerns is available in Annex 5.

⁷ Government decision 14/01/2016: Assignment to participate in the implementation of the EU Strategy for the Baltic Sea region and its action plan

⁸ Government decision 14/01/2016: Assignment to participate in the implementation of the EU Strategy for the Baltic Sea region and its action plan

⁹ According to information from PAC Hazards, SEPA has applied for, and has been granted, external funds for the implementation of the coordination role. During the period 2011-2015, resources came directly from the Commission. Since 2015, SEPA seeks funding from the Interreg Baltic Sea programme's specific awards for EUSBSR.

3.2 PA Hazards

As a policy area coordinator, SEPA's role is not only to assist with the development of regional policy, but also to act as a link between decisions at the policy level (e.g. EU, HELCOM, national) and their implementation locally and regionally (e.g., municipalities, private sector, academia). It is a challenge to develop and maintain networks at every level throughout the region. The coordinator's role also involves maintaining certain expertise in the policy area concerned, and knowledge of, inter alia, communications, financing systems, EU processes and project development. In practice, the coordinator is also responsible for a number of other issues relating to the transfer of knowledge and exchange of expertise between the Baltic Sea countries through workshops. Such issues should really fall under the steering group's area of responsibility (see below under item 3.3). Workshops can also be used for the presentation of projects intended to become flagships.

The steering group works according to the PA Hazards work plan for 2015-2017¹⁰ and the interim work plan for 2017¹¹, not the internal SEPA activity plan. Attached to the 2017 work plan is a matrix dated January 2017 covering actions and associated projects and activities. It states that it is updated continuously. However, it was not updated during January 2017, but the January annex still applies¹². This is well in line with the objectives of the EU Baltic Sea strategy. According to the interviews, the work plan is also a good platform for dialogues with various stakeholders.

According to the interviews, practically everything has been implemented in accordance with the work plan. An exception is the goal of establishing a dialogue platform for 'dumped munitions' and weapons. Partners from PA Hazards previous flagship CHEMSEA project were responsible for measures (the platform), but it was never implemented due to changed priorities. It has instead become a follow-up project with Daimon, so all in all there are grounds for asserting that PA Hazards work has achieved its anticipated and planned scope.

The policy coordinator (PAC), which in this case consists of two people (1.5 full-time positions) has a key role in the implementation of PA Hazards work. According to the action plan, PAC's responsibilities include:

- coordinating participation and collaboration among concerned stakeholders throughout the macro-region in close cooperation with them
- implementing and following up policy area goals and indicators
- supporting and coordinating policy discussions in the Baltic Sea region in the policy area concerned
- supporting development and implementation of intervention areas and flagships within the framework of the policy area
- the dissemination of relevant findings and recommendations from ongoing and concluded flagship projects at policy level, and ensuring policy area communication and visibility
- maintaining a dialogue with financing organisations/institutions aimed at focusing available resources for funding the implementation of the policy area and flagship projects.
- forming alliances and collaborations with other policy area/horizontal action area coordinators to ensure conformity and avoid duplication of work in the implementation of EUSBSR, and to
- monitor progress within the policy area and report on it.

3.3 PA Hazards steering group

PA Hazards has a steering group comprising appointed officials (with expertise in the fields of the environment and water) from all of the Baltic Sea countries, as well as a representative from HELCOM

¹⁰ PA Hazards work plan 2015-2017, dated 30/03/2015

¹¹ PA Hazards – Work Plan 2017 dated 24/01/2017, but approved by PA Hazards steering group on 10/11/2016

¹² Annex 3 Actions and associated projects and activities within PA Hazards, Jan 2017

and representatives for the EU Commission (DG Regio and DG Environment). The steering group was established in 2010. Sweden has representatives from HaV and KemI in the steering group. The steering group Chair is the policy coordinator for PA Hazards (PAC) at SEPA.

The role of the steering group is to promote and support the development of PA Hazards by providing advice and assistance to the PAC. The steering group not only acts as a dialogue and decision-making forum with regard to the work's focus, concrete activities and flagship projects, but also disseminates findings within the entire Baltic Sea region, including to stakeholders who can be regarded as interested parties in the issues.

Thus the steering group discusses and decides on focus areas, flagship projects, networks and other worthwhile activities concerning work with hazardous substances in the Baltic Sea region.

Under the EUSBSR Action Plan, the steering group must hold two meetings per year. For practical and financial reasons, only one physical steering group meeting is held per year, while the second meeting is carried out by means of communications technologies. The minutes taken at steering group meetings are made available to participants in draft form before they are approved. The minutes and documents are available through the PA Hazards Dropbox. It is not always clear in the minutes what is a decision, a discussion point or information. The minutes are not always dated or clearly marked as to whether they constitute a draft or final version.

3.4 Work plan

According to the work plan adopted by the PA Hazards steering group for 2017, which in practice is an update of the work plan for 2015-2017¹³, and the TA application for 2016-2018, the following are the four focus areas with the overall objectives for PA Hazards operations:

- prevent emissions, and reduce the use, of hazardous substances;
- mitigate and prevent contamination;
- support the implementation of laws and conventions, and to
- promote R&D into innovative solutions.

The first two focus areas include a number of flagship projects in which implementation takes place.

Flagship projects is the designation given to large international projects or processes whose activities and outcomes must help to achieve the objectives of the Baltic Sea strategy. The size of flagship projects means that their results are intended to have micro-regional importance. Flagship project issues must be relevant to policy and aid working toward the goals, indicators and objectives for PA Hazards in the EU Baltic Sea strategy. Flagships may consist of international projects or serve as an umbrella under which several projects jointly operate towards the flagship's objective in one of the four focus areas. In recent years, the flagships have come to be regarded as processes, as demonstrated by the projects that applied for seed money¹⁴ for development into flagship projects.

In the last two focus areas, PAC works with measures such as organizing workshops, capacity transfer initiatives, communications, steering group coordination, the preparation of strategy documents and seeking finance etc.

¹³ According to PAC, among the reasons the update was made were that a number of projects had been completed and new flagships added, and clearer practical guidance was sought specifically for 2017. The work plan for 2015-2017 was the first.

¹⁴The EU Parliament and Commission use the term for funding projects during the idea stage, i.e. as venture capital specifically for these initial stages.

Seminars can also capture individual national interests and needs within PA Hazards in the various member countries in the Baltic Sea strategy, and identify thematic areas (and stakeholders) who may initially seek seed money for projects to develop them into flagship projects.

4 Plans and impacts

This chapter describes and assesses the progress and results achieved in PA Hazards work since 2013 with regard to reaching the targets set in the policy area as formulated in the EUSBSR Action Plan. The chapter culminates in an assessment of compliance with measures, targets and indicators described for the Baltic Sea strategy action plan policy area.

4.1 Observations

4.1.1 PA Hazards work plan

At the heart of PA Hazards is its relationship to the objectives of the EU strategy for the Baltic Sea region (EUSBSR), relevant policy frameworks and conventions as well as current scientific and technical knowledge and advances. It's against this background that PA Hazards works with prioritised issues and activities.

Because of the multi-faceted task, however, there is a risk that the work is "sprawling" and thereby losing focus and impact. The prioritisation of which initiatives should be taken within the PA Hazards framework together with support from SEPA (e.g. in coordination and communications), the Swedish Ministry of the Environment and Energy (e.g. policy decisions and prioritisations in the point at issue), the Swedish Council of Ministers (e.g. policy decisions and prioritisations concerning EUSBSR), other civil authorities (primarily the Swedish Chemicals Agency and the Swedish Agency for Marine and Water Management), the EU Commission (DG Environment and DG Regio) are fundamental conditions for the implementation of PA Hazards work.

An activity plan is drawn up every year. SEPA's activity plan for work within the EU Baltic Sea strategy during 2017, describes in detail its impact and environmental objectives with regard to PA Hazards and work within the flagships:

- for the impact area *Environmental and health effects*
- for the impact area *Ecologically sustainable development*
- for the impact area *Reinforced implementation*
- to achieve a *Non-toxic environment in the Baltic Sea catchment area*, the intention is to strive to help achieve intermediate objectives that include '*a balanced marine environment, flourishing coastal areas and archipelagos*'.

4.1.2 Impacts according to information at the steering group meetings

The minutes from the steering group meetings still do not report any overall results and impacts, only results from some of the flagships. This could very well be a consequence of how documentation is carried out, as there are no clear, comprehensive rules in this regard. Thus at the steering group meeting in May 2013, results were presented from the concluded COHIBA project in the form of "*a palette of measures*" that HELCOM member countries have approved, and as a guide book regarding "*measures to reduce discharges, emissions and the removal of dangerous substances from different sources*". The completed SMOCs project also resulted in a Guideline, in this case for "*Sustainable management of contaminated sediments*".

At the steering group meeting in January 2014, the results from SMOCS were again touched upon, as was CHEMSEA's work as regards "cleaning up" after the use of chemical weapons. Both projects were considered to have achieved such good results that they should be brought before EUSBSR as exemplars.

The steering group meeting in June 2016 discussed the possibility of using roadshows to present results from flagship projects. However, the minutes do not clearly show how this is supposed to take place and the only prospective participants mentioned for the roadshows are steering group members and the co-organiser for the steering group meeting held in Lithuania, PAFP and relevant interested parties in Lithuania. The year-end 2016 meeting discussed a work plan for how to disseminate the results of MORPHEUS. However, the minutes of the meeting contain no specific measures¹⁵.

The steering group meeting in May 2017 mainly discussed projects in progress and very few results. However, it was announced at the meeting that CHANGE (regarding toxic antifouling from leisure boats in the Baltic Sea) would be presented at the HELCOM meeting 24-26 October 2017. At the meeting, CHANGE gave an account of the five regulatory changes and two information campaigns to phase out toxic antifouling paints that the project assisted with, and which are intended for implementation by the Baltic Sea States.

In the steering group meetings discussions regarding the projects, it was pointed out several times that, instead of always concentrating on *taking action* as a result of measurements, it would be better to concentrate on providing information about the measurements themselves. However, the minutes say nothing about how the necessary measures should be identified, decided upon or implemented. Did the steering group intend for the measures to be taken through initiatives in the different countries concerned? How did the steering group intend for this to be monitored? These are just some of the questions that are not always answered in the minutes.

4.1.3 Results and effects according to the interviews

According to the interviewees¹⁶, the PA Hazards work plan objectives have been fulfilled well and the planned activities carried out. However, some of the interviewees point out that the objectives were formulated by PA Hazards in order for them to be realistic. The steering group has ambitions to take on more than what is considered realistic for inclusion in the action plan under the resources currently available for the PAC. Accordingly, the ability to develop the working method to achieve greater impact from available personnel resources is considered to be an important issue, and is one of the reasons this evaluation was initiated.

According to more than one interviewee, PA Hazards is one of the best policy areas. One success factor mentioned is PA Hazards proactive efforts to first identify what the policy area needs and then pick projects or project concepts that can contribute to this. Another success factor put forward in the interviews is a very competent, motivated PAC.

The work within PA Hazards on the pharmaceutical side, where a platform with underlying projects was created, was highlighted in the interviews as an important outcome of the priorities made early on. This is the area most commonly addressed when it comes to describing the concrete effects of PA Hazards in the interviews. According to the interviewees, it is here that PA Hazards has for several years been a driving force in a way that contributed to the documented results. One of the reasons that efforts in this

¹⁵ According to PAC, this information is in follow-up documentation from the visit and which was distributed at the steering group meeting in the spring of 2017. However, the evaluation team has not had access to this documentation.

¹⁶ Because the interview questions were the same for all interviewees (although flagship projects had an extra set of questions) the data that emerged from the interviews was validated through multiple respondents providing similar answers. The semi-structured questions contributed to the in-depth answers.

area have worked so well is that several countries have prioritised the area. While interviewees from the Government Offices of Sweden also stressed the importance of the results on the pharmaceutical side, they also feel that PA Hazards did not disseminate information about the very useful project status report widely enough.

Dioxins were a priority issue where similar approaches were tried, but failed. PA Hazards did not fully achieve its goals because of resistance at the policy level. This initiative has therefore been put on hold. While dioxins usually have much more serious effects than drugs, the PAC was pragmatic and instead focused on an area where it was possible to reach clearly visible outcomes.

Several interviewees also wanted to see more connections between research and the results of PA Hazards efforts. According to interviewed representatives from DAIMON, PA Hazards seeks to provide a basis for this connection within "dumped munitions".

Some interviewees noted that the ability to seek seed money provides good opportunities to develop good projects and thus better results. However, two of the difficulties from PAC's perspective are the process and PAC's own capacity for contributing funding. The Interreg Baltic Sea Region Programme (BSRP) relies on PAC's assessments of relevant projects, something the steering committee evaluates and makes joint decisions on. This process and the EUSBSR / PA Hazards link to Interreg BSRP is not described anywhere. The task of evaluating both applications for seed money and requests for funds for full-scale projects from Interreg BSRP is quite a big undertaking for the PAC and the steering committee. For this reason, the PAC and steering group have, over a number of years, developed a process and an evaluation tool to facilitate steering group work and make decisions more transparent.

After the evaluation, PA Hazards recommended the following for seed money: 2013 BLASTIC, CONDOR and Aquaclean (= NonHazCity); 2015 PHARMA, Clear Waters and HAZBREF; 2016 GrePPP, MicroWasteBaltic and CONTAR. All were awarded seed money.

Additionally, PA Hazards provided development support and a letter of commitment to the full-scale application of CONDOR, DAIMON and NonHazCity 2014; MORPHEUS 2015, and HAZBREF and CWPharma 2016.

Several of the flagships are ongoing (such as DAIMON) or under development (for example, HAZBREF) and it's still too early to expect more tangible effects from the work. The interviews highlighted the importance of having their own contacts in the various countries, which also include contacts on the research side. Even projects that have already received seed money to develop intended flagships (such as CONTAR and GrePPP) include partners with a scientific focus, something that will hopefully safeguard the scientific basis and thus the credibility of the results.

4.2 Summary analysis, conclusions and recommendations

Both the documentation reviews and the assessments by the interviewees, indicate that today's PA Hazards results and impacts are at the anticipated level. It was pointed out in the interviews that during the past two years in particular, PA Hazards working strategies have truly been able to demonstrate good results. The interviewees attribute these improved results largely to the current PAC, who received a staffing reinforcement during the same period.

The clearest results are the developments on the pharmaceutical side. This was an early priority, where the area was methodically and strategically developed and gained good internal support. Furthermore,

project funding was raised¹⁷, new projects were stimulated and conditions created for increased collaboration. There has been consensus and interest from the beginning. PA Hazards has been a driving force in the process for many years and supports the development of networks on the platform. PA Hazards would now be happy to see other parties take over responsibility for the platform. It is important that ownership is transferred to the parties concerned in the ordinary structures, which means that individual countries themselves must take responsibility for the development and implementation of the legislation, which must naturally take place within each respective country (as well as at EU level).

As described above, initiatives were taken for a corresponding development in the case of dioxins, but without any real success. For strategic reasons, PA Hazards chose not to proceed. Also, in our opinion it's better to focus the limited resources to areas where there is good potential for achieving an impact.

Our analysis shows that the results and effects achieved within the four focus areas during the period 2013-2017 have clear links to the issues specially highlighted through flagship projects; this should be self-evident as the focus of flagships must be governed by the first two focus areas. Flagship projects address these issues in depth and scientific institutions are often represented among the parties. Furthermore, many of the Baltic States are represented at the policy level.

This provides good conditions for reports based on solid scientific foundations, but which are more than 'just research papers'. Research reports sometimes use a scientific language that can make them more difficult to understand at the political/policy level. This can make traditional scientific reports less directly applicable at the policy level.

On the other hand, if reports of results use a language that is too policy oriented, there is a risk that the scientific basis for the report becomes too weak, and for this reason the final results may not really add much new material to 'go on', which can mean that the results will not be usable in a longer perspective.

The above shows that when it comes to reports from the four PA Hazards focus areas, it is important to ensure they are done with a good balance between the focus on scientific and policy matters. The ability to present results and impacts that are sustainable in terms of time and geography that can provide good conditions for collaboration between the countries around the Baltic Sea – both EU members and non-members – and which thereby contribute to the sustainable development of the Baltic Sea from the perspective of hazardous substances, should also be pursued. This is one of the main policy coordinator tasks and it is managed well, but with new project players it will be important to continue to maintain this good balance.

To achieve the desired effects, it is also important that information about the work and the results be made readily available, and that, for example, the home page has a clickable list of reports produced. For the results to have the intended effect, it will be necessary for them to be visible to a greater extent than today.

Based on the above analysis, we present the following recommendations:

- ***Make sure the minutes from the steering group meetings are drawn up according to a template so that the same type of information is provided by the meetings and that resolutions are clearly shown.***
- ***The minutes from the steering group meetings should include a follow-up to ensure all of the resolutions adopted at the previous meeting are actioned.***

¹⁷ As a result of its dialogues and work with impacts, Interreg BSRP now has an opening for pharmaceutical projects in its announcements during the period 2014-2020.

- **Easily accessible information about flagship projects and their results and PA Hazards in general are crucial for achieving the intended effects. Ensure that results are made visible through published reports, which are available or easily searchable via the website.**
- Also to work **together with other operators** in the upcoming flagship projects to ensure that the balance between the scientific and policy approaches is such that they reinforce each other's positive aspects both in reporting and in the conditions provided to enable the use of project results in policy development.

5 Dissemination of information and communicating results

This chapter analyses the part PA Hazards and its steering group has played in the dissemination of results. It also analyses how the results of the project were communicated at the political level. Because these issues are intimately linked to PA Hazards results, the issues were partly addressed above in Chapter 4. Chapter 4 focuses on issues concerning plans and effects, with links to goal achievement, i.e. how documented effects and plans can be considered as key components when it comes to achieving goals. This chapter deals with the dissemination of the results analysed in the previous chapter.

The chapter culminates in recommendations as to how the dialogue with other parties can be developed to provide better conditions for policymaking at the political level.

5.1 Observations

5.1.1 PA Hazards work plan vs SEPA's annual activity plan

Communication initiatives play an important part in the activity plan for SEPA's work in the EU Baltic Sea strategy during 2017. The areas where SEPA adds greatest weight are in the implementation of flagship projects and the communication of results to the appropriate stakeholders. The plan also states that SEPA intends to highlight relevant results and influence measures in e.g. HELCOM.

The intention is also to make the results available for use in the national action programmes. The plan also mentions SEPA's hope that priority areas with regard to new knowledge gained through PA Hazards could lead to joint regional undertakings. The plan also states that PA Hazards intends to seek broader collaboration, among others with the European Commission's DG Environment in connection with the development of the projects. There is also a desire to develop the work with new technologies and innovations in cooperation with PA Innovation.

It is part of SEPA's government assignment to pursue active, goal-oriented communication efforts. For the purposes of strategy, SEPA's ambition is to communicate its role, the added value of macro regional collaboration for environmental efforts and goal processes, and their results both internally at SEPA and externally.

In January 2017, efforts began to develop individual "work plans for the dissemination of results" together with every project. The purpose of the plans is to meet the requirements of the PAC in relation with project managers (according to the roles defined in the EU Baltic Sea strategy) to formalise an ongoing dialogue between PAC and the flagship projects. This means the "work plans for the dissemination of results" identified can be considered as formal internal plans which, even though they are intended to include detailed information on the work planned within the projects, do not include planning for the dissemination of information externally. The plans will make it easier for PAC and the steering group to monitor the progress of projects, and through dialogues understand what, when and how PAC/PA Hazards can support the projects. However, the plans will not make it easier for external stakeholders to stay informed about PA Hazards activities. Plans have been prepared in four flagship

projects (BLASTIC, NonHazCity, DAIMON and CHANGE) and have been updated once or twice during the year. Plans for new flagship projects are under development. The template for what must be included in the plans and how they must be followed up is under development. For example, special planning for the project's final year and result dissemination following project conclusion has now been added.

The plans contain detailed information about the work of the flagship project CHANGE (Toxic anti-fouling paints, funded by BONUS) to disseminate the results and develop policy recommendations during the project's final year. PAC supports project participation in dissemination conferences on an ongoing basis. PAC also supported the NonHazCity and BLASTIC projects in presenting their first results at the 7th Annual Forum on the EU Baltic Sea strategy, 8-9 November 2016 in Stockholm.

PA Hazards carried out a dialogue seminar known as roadshow in collaboration with the national focal point in Lithuania and the members of the PA Hazards steering group. The first seminar was held on 8 December 2016 in Vilnius, Lithuania, in collaboration with the Lithuanian Environmental Protection Agency. The goal of the dialogue seminar was to present PA Hazards activities and results to relevant and affected national representatives in different Baltic Sea countries, to increase awareness of the policy and its flagship project. The seminar sought to share experiences about matters that concern Lithuania's interests and priorities in the area of hazardous substances in the environment, and to discuss how to improve collaboration in the future.

Three key issues were discussed during a workshop within the framework of the seminar:

1. How is coordination of the EU strategy for the Baltic Sea region structured nationally or how should it be structured?
2. How can we ensure that project results reach the right national parties to drive/influence policy development?
3. What are the main priorities regarding chemicals and hazardous substances and what/how can they be linked to planned work in PA Hazards?

These questions are also important points for discussion in other countries participating in PA Hazards.

5.1.2 The interviews

A communication plan should be developed for each flagship project describing the relevant target groups and the type of support for the dissemination of results and the development of policy recommendations. Even though the PA Hazards communication plan extends to 2020 and the flagship projects' communication plans in most cases extend to 2018, the plans described above have not been possible to implement to the desired extent, something which interviewees believe mainly depends on a lack of personnel and resources.

According to the interviews with the PAC for PA Hazards, the ambition is still to disseminate results to a greater extent than has been the case thus far. An important reason for this would appear to be that under PA Hazards working methods, it is the flagship projects that present results and for obvious reasons it takes time before the projects achieve results from their efforts that are worthy of dissemination. During the period covered by the evaluation, the majority of flagship projects have not reached that stage. According to some of the interviewees, a clear strategy and structure for how the transfer of results should take place is lacking, i.e. a structure that would allow results to 'survive' and carryover for continued efforts after the end of the project.

According to the interviewees, communication with flagship projects could be better. The projects could also do with more support for their communications efforts. Right now, the greatest need is support for the dissemination of results. This has been an internal working objective and according to the

interviewees, it has gradually improved, but there is still potential for further improvements. The support the flagship projects are asking for in particular is help with relevant contacts at the policy level.

According to the interviewees, the flagship projects are good at communicating the results in their own networks, reference groups etc. Resources should be allocated for communicating results in all project budgets. The idea is not for PA Hazards to provide financial support to flagship projects to organise dissemination conferences. However, it has happened that PA Hazards has funded materials or travel for activities that were specifically requested by PA Hazards.

The use of communications technology not only for PA Hazards but also in many other contexts it is considered desirable. Several interviewees pointed out that PA Hazards should also use links in other meetings such as project presentation so that participation does not become dependent on the individual participant's (the country's) economic circumstances or how the travel budget is designed in the case concerned.

PA Hazards could, according to some of the interviewees, be better at communicating the results to various parties in the Baltic Sea region, i.e. beyond what is each project's 'natural' distribution area. SEPA provides information via the internet, but according to the interviewees, this is not always an effective means of communication. PA Hazards is active on twitter, but only one or two steering group members are followers. Because PAC does not have time to write newsletters, this is not part of the activity plan. It became apparent during the interviews that more often than not PA Hazards does not get invited to relevant conferences because 'they are too invisible'.

In the interviews, steering group members clarified the themes they consider important to work with. But the steering group or its individual members do not always contribute further in the preparation and/or implementation process. The PAC would like to see steering group members become more proactive in this work, from proposing projects to disseminating the results. Also, initially, there was very low attendance at steering committee meetings, which of course reduced the ability to disseminate information about results through this channel. However, attendance at steering committee meetings has gradually improved, as have the conditions regarding the dissemination of information and communicating results.

Steering committee members are not only very important for contacts with established networks in their respective countries, but also for providing information to and from the projects. According to the interviewees, the steering group has a good composition, where the appropriate organisations are represented. However, there is a need to strengthen national grassroots support by developing steering group members' means of communicating results to their respective national stakeholders and networks.

Several members feel that the steering group does not always communicate results to the desired extent. Because steering group members usually work with policy-related issues in their own country, some of those interviewed felt that the projects should to a greater extent transfer results of a policy development effort through the steering group. However, some of those interviewed declared that it is hard to gain political acceptance of recommendations based solely on the results of flagship projects. It is interesting to note here that several interviewees believe it easier to push through important issues/results within HELCOM.

Some of those interviewed also emphasised the importance of collaboration between representatives of several countries for driving results further. This is especially important when it comes to issues at the political level. In these contexts, it is very useful if the issues are also pursued within HELCOM. It is important to make as much use as possible of the links between the work in PA Hazards and HELCOM to achieve synergies at the policy level. There is already a collaboration here in which the projects drawn up within PA Hazards may be preferable to responsible parties in the Government Offices of Sweden.

HELCOM has a more distinct legal structure than PA Hazards and thus works in well-defined policy development processes. But since PA Hazards and HELCOM have common interests, it should also be possible for PA Hazards to build on the collaboration that already exists between the parties within HELCOM and thus develop a dialogue that provides better conditions for policymaking at the political level.

At the departmental level, opinions are divided regarding information about the results. Some interviewees believe that PA Hazards did well to cover the policy area by the action objectives so that the results ultimately could be passed on. However, one interviewee thought that the results should also be disseminated in other forms, such as op-ed articles. Perhaps a combination would be a solution. Because some of the other interviewees felt that results from PA Hazards flagship projects were not made as transparent as they were by e.g. PA Nutri or PA Capacity, perhaps the idea concerning op-ed articles would be a step in the right direction.

The dialogue with the Commission has not fully responded to needs. According to the PAC, DG Regio has not managed to involve other DGs to an adequate extent. No sufficiently broad and deep interest in PA Hazards and the Baltic Sea strategy is perceived to exist within the Commission, which is obviously related to the fact that the Commission has many important issues that must be addressed. According to interviewees, this is partly because of the strategy's inherent form when it was launched with great visions, but without an adequate structure or sufficient control¹⁸. Consequently, the result depends on the circumstances of each coordinating function, in terms of where and at what level it is located, and with what resources. PA Hazards intends to discuss a new communication strategy with the Commission with an emphasis on priority issues, but the Commission has not been able to take part in the work to the desired extent. Accordingly, PA Hazards has worked more in support of the individual flagship projects in their dialogues with the Commission concerning recommended actions.

Different policy areas work in different ways. PA Transport, coordinated by the Swedish Ministry of Enterprise and Innovation, works more directly with Europe, as subject areas here include specific transport issues such as road networks and railways etc., which are often transnational. Work at PA Bioeconomy also has clearer direct contacts with the EU, as it is more synonymous with the EU's other priorities and because the Nordic Council of Ministers is the sender. There is a high degree of personal dependence at the coordinator level (appropriate organisation; right level, resources and mandate), but not at the EU level. According to the interviewees, the shortcomings there primarily concern structure and priorities.

5.2 Summary analysis, conclusions and recommendations

Our analysis of the dissemination of information and communication of results shows that much greater efforts are desirable at every level. That this is not the case is to a large extent a question of resources. But it is also partly a question of the priorities various parties make and the extent to which PA Hazards in particular is given attention, when there is not time enough for everything perceived as important. From this standpoint, cross-sector cooperation is encouraged wherever feasible in order to raise each other's perspectives and create better conditions for putting across information and results.

The members of the steering committee do not always appear to be aware of their role in the dissemination of information and the communication of results, even though this is made clear in their role descriptions. According to information provided in the interviews, PA focal points are not always aware that they are designated as focal points. However, this is primarily a structural problem and not a

¹⁸One of the strategy's pillar is 'No new departments, no new structures'. This was a compromise to get the strategy approved by the member countries. It was based on the fact that there is sufficient structure and guidance, but that the strategy would provide help with coordination in a better way.

staff issue. The idea is that the members of the steering group should be the network hub at the national level, i.e. the primary point of contact in each country. But sometimes steering committee members do not even have the resources – nor the time to set aside – to travel to PA Hazards meetings. Because the strategy demands that everything be done within the existing structure and framework, such shortcomings create difficulties when it comes to getting actual work to function. From a purely technical standpoint and in order to minimise financial and budgetary constraints, opportunities for participation are created through the use of communications technologies in the various types of meetings organised.

Because PA Hazards role includes supporting collaboration between existing institutions and expediting this work, it has established a collaboration with HELCOM, and regularly discusses how they can support each other's processes. This collaboration should continue, and opportunities for deeper cooperation taken.

In Lithuania, a national roadshow meeting was organised with concerned parties at policy level. The interviewees felt this to be a good concept. Roadshows allow PA Hazards to present the role of the national focal points. Discussions have been held with Estonia and Denmark to carry out similar roadshows. There are also good examples from other policy areas such as PA Education that have worked with roadshows a lot to build up networks and gain grassroots support.

There is limited experience of how SEPA and the Government Offices of Sweden can make use of regional collaboration within the framework of the Baltic Sea strategy and how the PAC assignment can be used to develop activities and leverage the limited resources available today to greater benefit.

Collaboration with the Swedish Ministry of the Environment and Energy is largely limited to regular email updates from SEPA and the provision by PAC of information that the Government Offices requires in connection with various issues dealt with by the Government Offices.

Collaboration with Marine and Water (HaV) and the Swedish Chemicals Agency (KemI) is weaker than one would expect. The requirement that Kemi should provide support to SEPA in the latter's Baltic Sea strategy efforts was removed from Kemi's last letter of appropriation. Thus, the burden has increased at SEPA in terms of government assignments, and it has taken on more responsibility. Previously, Kemi could participate more actively in preparatory work.

HaV and KemI are of the opinion that because their letters of appropriation did not expressly mention work with PA Hazards, the authorities have no formal role that would provide conditions for more active participation. This naturally means that the issues will not have as high a priority than if they had been included in a letter of appropriation. However, for SEPA's part it has always been desirable for HaV and KemI to have more distinct assignments. Both HaV and KemI contribute to preparatory work and bring new aspects to discussions when they take part in steering group meetings.

A great deal of result information is passed on via HELCOM's working groups. Even though PA Hazards is formally subordinate to EUSBSR, the latter is not an organisation in the same way as e.g. HELCOM is, but is a strategy developed and formally adopted by the EU Commission. A strategy intended for implementation by the Baltic Sea states must naturally 'govern' efforts at the political level to a certain extent. But there is no group able to act as PA Hazards' counterparty in discussions with the EU. Instead, the EU is represented in PA Hazards work by DG Environment and DG Regio, who have many other areas on their desks, which also makes it difficult to build a partnership in this area strong enough to improve conditions for policymaking at the political level.

Based on the above analysis, we make the following recommendations for how the dialogue can be developed to provide better conditions for policymaking at the political level:

- ***By providing concrete, well-supported information ensure that the steering group members enjoy the best possible conditions for fulfilling their commitments.***
- ***Undertake road shows, in accordance with the concept drawn up.***
- ***Ensure an active exchange of information between the Government Offices of Sweden and PA Hazards.*** This collaboration should continue to be a top priority, where opportunities for deeper cooperation are taken. The exchange of information should not only seek to keep Government Offices up to date on developments in policy related issues to facilitate decisions that involve a change in policy direction stemming from the work of PA Hazards and its results, but also to keep PAC updated with regard to the policy agenda.
- To continue to develop and make use of the links between the work in PA Hazards and HELCOM to achieve synergies at the policy level. HELCOM has a legal structure that also provides the tools for policymaking at the political level for PA Hazards.
- ***In general, increased opportunities for participation are created using communication technologies in the different types of meetings organised within PA Hazards to increase attendance. Experiences from the web-based steering group meetings should be put to use in this context.***

6 Implementing PA Hazards work

In this chapter, we analyze how relevant results from PA Hazards work, including results from flagship projects, can be implemented.

6.1 Observations

According to the interviewees, PAC has carried out its undertaking in accordance with the description of responsibilities and assignments meritoriously. Here are some examples of measures that were implemented well:

In 2013, the first structured discussions were held on the organisation, structure, target group and priorities of PA Hazards. In the same year, a number of projects were also evaluated for seed money, and BLASTIC, CONDOR and Aquaclean (identified as NonHazCity) were recommended as recipients. In 2014, NonHazCity, CONDOR and DAIMON were considered to be good candidates for full scale projects, and they were formally informed. During 2014, a working plan was also developed for PA Hazards for the period 2015-2017.

CHANGE was approved as a flagship project in 2015. Three new PA Hazards flagship projects were approved during 2016, namely BLASTIC, NonHazCity and DAIMON. The cluster flagship 'Pharmaceuticals in the Baltic Sea environment (PIE)' was approved in January 2017. The Morpheus project, funded by the INTERREG Southern Baltic Sea programme and the CWPharma project are included, as are the seed-money-funded projects GrePPP and MicroWasteBaltic. The cluster flagship includes activities linked to the creation of a status report regarding pharmaceuticals in the Baltic Sea environment, as well as governance and networking activities for pharmaceuticals in the Baltic Sea region and within HELCOM. In November 2017, an additional new flagship project – HAZBREF – was approved. Most of the current flagship projects were developed with the support of the PAC, together with seed money funding, i.e. during the period 2013-2017.

In work with water and emissions, and the assignment concerning the coordination of policy area Hazards, collaboration with HELCOM was enhanced in areas such as 'Pharmaceuticals in the environment' and the recycling of nutrients from sewage sludge and manure in a non-toxic cycle.

During the development of parts of the flagship project 'Pharmaceuticals in the Baltic Sea environment', the existing good relations with various relevant funding programmes was strengthened, especially with INTERREG Baltic and the Southern Baltic Sea programme. The work with PA Hazards in the area of Pharmaceuticals in the Baltic Sea environment helped increase collaboration with HELCOM on the pharmaceuticals side. In 2016, the Pharma platform was developed, which was accepted as a flagship project under EUSBSR. HELCOM then initiated a corresponding group on pharmaceuticals.

An ongoing flagship project has applied for funding from Russian partners through the Swedish Institute's third country component (NonHazCity) and a project (BLASTIC) will examine the possibility of requesting money for initialisation projects under a current call to build collaborations with Russia and the Baltic countries.

According to the interviewees, the approach varies between different policy areas. The Swedish Agency for Economic and Regional Growth's network meetings for the whole Baltic Sea strategy also show that approaches differ, e.g. when it comes to elements of local activities and steering group commitment. PA Nutri has comparable working methods as PA Hazards, with several projects and a similar dialogue with HELCOM.

PA Hazards has initiated a number of collaborations with other PAs. Among these, the following receive special mention in the interviews:

PA Nutri, PA Bioeconomy

- The topic was the circular economy and recycling nutrients from slurry and manure in a non-toxic cycle.
- Analysis of the measures planned under the EU Framework Water Directive and the EU Maritime Directive in planned studies under the approved application for the PA Nutri-Hazards project 2016-2018.

PA Innovation

- Development of collaboration opportunities in environmental technology (Cleantech) within the network of authorities managing regional development funds (MA network) under Uminova's project management.

PA Bioeconomy (which reports to the Nordic Council of Ministers) works more toward the business community, which provides alternative contact points. The same is true for PA Innovation. PA Education works with major processes instead of individual projects and has created clusters that serve as platforms. The development of the pharmaceutical platform is a trial in this direction, and there are good reasons to continue, as it has proved to be very successful.

In addition to PA Nutri, PA Hazards has tried to initiate collaboration with other policy players such as PA innovation with whom it has attempted a dialogue, but thus far without any response.

6.2 Summary analysis, conclusions and recommendations

Our analysis shows that the implementation of PA Hazards work is essentially proceeding to plan. According to the interviews PAC has done an excellent job implementing the steering group's decisions. This is confirmed by the written documentation. The resources for implementing PA Hazards work are limited and it is therefore important that the various parties take the initiative to implement the relevant measures in the context of their regular undertakings. This applies not only in Sweden, but also in other countries.

The concept used for the development of the pharmaceutical platform was successful and should also be used in other areas, where similar working conditions pertain or can be created.

Some steering group members declare that there is a need to identify ideas linked to innovation, funding and investments as a complement to the projects as project funding is not sustainable. The issue should be discussed at a steering group meeting as soon as possible.

In the previous chapter, we provided concrete recommendations regarding e.g. developing the communication of the results of PA Hazards work.

Based on the above analysis, we also submit the following recommendation regarding how relevant results from PA Hazards work, including those of the flagship projects, can be implemented:

- ***PA Hazards should identify and communicate ideas linked to innovation, funding and investments as a complement to the projects, as project funding is not sustainable.***
- ***The successful concept used in the development of the pharmaceutical platform should also be used in other areas, where similar working conditions pertain or can be created.***

7 PA Hazards' overall strategy

This chapter analyses the overall PA Hazards strategy and working method. In interviews with the PACs for other policy areas, we also looked at PA Hazards working methods in relation to how other policy areas work within the Baltic Sea strategy. The chapter culminates in proposals for revising the working strategy and recommendations concerning the future design, scope and direction of PA Hazards work from 2018 onwards. Finally, recommendations are made concerning improvements to current coordination, collaboration and communications processes for the policy area so that PA Hazards work can evolve and objectives be better achieved.

7.1 Observations

7.1.1 PA Hazards' overall strategy

PA Hazards pursues strategic process efforts (the policy-to-project-to-policy process) to develop flagship projects in accordance with the action and focus areas adopted by strategic work plans. In this context, opportunities are taken to seek funding form initiation projects. Specific selection criteria were created for INTERREG Baltic Sea programme's first call for initiation projects, which reflected the thematic priorities of PA Hazards, in order to evaluate incoming proposals.

What is the process for initiating and selecting flagship projects? There is no description for the entire process. However, there is an evaluation template for the assessment of concept notes. On the other hand, no assessment of the finished project applications is made. PAC assesses relevance linked to objectives and priorities, and projects with assured funding. Because several project managers noted that a clear description of the process for developing flagship products is lacking, it is important that such be developed and made available to any interested parties.

According to PAC, there it is the formal process and the criteria described in the EUSBSR action plan. There is no specific process for PA Hazards directly documented. However, PAC feels there is a logic in how eligibility criteria are selected and documented for recommending projects for seed money funding. Projects applying for flagship status are those previously chosen for development support and funding

(for which projects there are thus emerging criteria and support in SG's decision). PA Hazards only has ties to flagship projects with secured financing (unlike other PAs/HAs).

PA Hazards has been in existence since 2010 and over the years it has established an extensive network of stakeholders who work with various themes relevant to PA Hazards. This network is used to create new partnerships and initiate new flagship projects. Some of the prospective flagship projects also emanate from PAC initiatives, which found promising projects under development and made proposals concerning how they could be developed further, perhaps with the help of seed money.

In order to ensure that the flagship results are disseminated to the appropriate parties and are able to influence policy development, communications plans have been developed for each flagship describing the relevant target groups and types of support for the dissemination of results and development of policy recommendations.

PA Nutri is the policy operator in closest collaboration as the PAs 'share' financing for implementing the PA Hazards-Nutri project, which supports coordination of both of their policy areas. Of course, the project arose out of clear common interests between the two PAs. Two joint activities are planned for 2016-2018: collaboration on the recycling of nutrients from sewage sludge and manure in non-toxic cycles, and analysis of the measures included in the EU Maritime Directive and the EU Water Directive.

7.1.2 The interviews

The work plan for 2015-2017 was the first and was of a strategic nature. According to the interviews, the necessary data for strategic planning was previously lacking.

In several areas pertaining to hazardous substances in the Baltic Sea, there are no evidence-based methods for clean-up or preventive measures. During the last strategy period, PA Hazards worked more systematically to ensure the development of the requisite evidence, among other ways through work on flagship projects. One example often mentioned in interviews is the work in developing and establishing the flagship project 'Pharmaceuticals in the Baltic Sea environment'.

PA Hazards has well-functioning procedures for seeking funding from the Interreg Baltic Sea programme and for following up, revising and reporting. PA Hazards has been successful in terms of creating projects that manage to attract project funds. There is an active dialogue with PA Hazards at each call for all project funding from Interreg. The PA Hazards PAC and steering group recommend who should receive financial support and those recommended receive financial aid to a greater extent in comparison with others. According to those interviewed, PA Hazards applies a good, structured selection process with clear evaluation criteria for recommending projects.

Those interviewed said that PAC has more contact with the projects now than in the past. Contacts with the projects can be split into three phases:

1. Supporting the development of new projects in terms of content, operators, funding etc.
2. During implementation, some initial support is provided, ensuring that results reach out through supplements to the project's own dissemination of results, and
3. Making sure that results survive and are carried forward upon completion of the project. However, a clear structure for this is lacking and setting up a plan with projects for phase 3 is a matter of some urgency.

There is some confusion in terms of what flagship status actually means. According to a few interviewees, flagship status is valuable, among other things in project marketing and as a door opener to valuable networks.

When it comes to what kind of support was most valuable for flagships, project managers emphasise contact introductions, access to networks, constructive feedback and help with possible funding routes. However, it is unclear what support the flagships should receive from the PAC and PA Hazards in general, and therefore expectations are to some extent unclear between the flagship and PA Hazards.

More recently, communications plans have been developed for flagship projects where they have had to describe e.g. the need for support. One objective has been to focus on the projects under PA Hazards for the coming three-year period. However, it is difficult to prioritise increased support to flagships within the constraints of the resources that currently exist for coordinating PA Hazards. In the interviews, the need was expressed for enhanced support in managing and disseminating the results of projects. For example, it would be helpful if the reports and other materials developed within projects could be made available and easily searchable on the PA Hazards website. It would also be good if PA Hazards could be given a larger budget in order to distribute funding for networking, workshops and other events, which is not possible under the current budget and mandate.

There is a communication project linked to the Baltic Sea strategy, but this does not help individual PAs with practical communication issues. This project is intended to function as 'a communication node to facilitate communications across the Baltic Sea region' and could make communication with relevant target groups easier.

There is a communication strategy for PA Hazards. There is also a communication plan for the government assignment as a whole, under which PA Hazards has received some help.

PA Hazards submits an annual report to the Swedish Agency for Economic and Regional Growth, but has not received any feedback in this regard, which otherwise would have been valuable for possible adjustments to the working strategy.

The interviewees feel there is potential for better results through increased PAC/HAC collaboration. The Collaborations already initiated (including Innovation, recycling nutrients from sewage sludge and manure) confirm the interest in collaboration. It helps to be able to support each other in organizing activities and developing thematic areas together, and to find synergies between policy areas. This could potentially ensure a more efficient and economic use of human and financial resources.

7.2 Summary analysis, conclusions and recommendations

Our analysis of PA Hazards' working strategy shows that there has been a continuous development of working methods and processes. The Baltic Sea Strategy is a relatively new collaborative approach in the EU, that seeks to achieve results by focusing efforts and resources towards priority areas. The Baltic Sea strategy is by nature still under development, which means the work must be constantly adapted to new conditions. At the same time, it's also possible to influence development and contribute to new solutions and forms of collaboration.

Initially, the flagship projects were stand-alone, without any links to each other. Later, PA Hazards tried to steer projects and processes towards prioritised needs, i.e. the 'gaps' in knowledge, and policy developments that already existed or were about to be developed. However, getting projects to link up with each other in suitable chains/processes requires long-term forward planning, but where this succeeds, it provides great added value.

Analysis reveals a number of risks at the macro-regional and national levels, the primary risks being the unclear overall control of the Baltic Sea strategy, and the low priority and participation of other member states.

Communication with all relevant stakeholders is very important and requires expertise and resources. The PAC operation is largely dependent on access to financing through technical funds (TA) via the INTERREG Baltic Sea programme.

Today, policy coordination corresponds to 1.5 full-time positions. Overall, a major part of the working hours is used up by administration and reporting. Accordingly, another important matter is the potential for simplifying administration and reporting. This matter is, however, outside PA Hazards control and also that of the present evaluation assignment.

Another possibility would be to re-prioritise and to focus only on a single thematic area, e.g. pharmaceuticals. But this is not in line with the ambitions of the Baltic Sea strategy. It is therefore important to discuss what can be done with current resources and conditions. Expectations are based on overall policy documents with a higher level of ambition than the present. Resource prioritisation is one of the steering group's most important tasks. There are also good reasons to more closely explore opportunities to expand resources for policy coordination at SEPA from 1.5 to 2.0 full-time positions, among other things to increase initiatives within strategic development, dissemination of results and the implementation of a reflection seminar (see below) and road shows.

If it is not possible to increase resources for PAC, the question is: How to get other parties to take greater responsibility? How to engage KemI and HaV in a different way? If KemI and HaV are given a clear assignment in the letter of appropriation when it comes to the participation of authorities in PA Hazards, conditions improve for the prioritisation of this work and the setting aside of adequate resources. This would ease SEPA's burden and make it easier to complete the assignment with its current resources.

There is no clear control of PA Hazards from the Government Offices of Sweden beyond what is stated in the government decision on the assignment to SEPA. PAC must take all of the member states' interests into consideration; however, it would be preferable to have clear signals from the Swedish Ministry of the Environment and Energy about Swedish priorities.

There is political interest in a national network for the Baltic Sea strategy's intermediate objective 'Save the Marine Environment' with the Ministry and relevant authorities as network partners. This will probably mean – if such a network is launched – a more passive participation from the Ministry, which mainly wishes to be kept up to date in order to act if necessary. The Ministry's role is to be active on the policy and political levels, but not operationally involved in implementation.

The evaluation assignment includes developing recommendations for the future scope and direction for PA Hazards work from 2018 onwards, and to propose any necessary revisions of the working strategy. In addition to the specific recommendations provided above, our summary and overall assessment is that PA Hazards has a good basis for its work through its link to the Commission and HELCOM, as well as the PA Hazards control group. The foundation needs to be strengthened so that it works better in practice. Among other things, there is a need to develop existing structures in several countries in the region and their institutions. Accomplishing this will require clear signals from the Commission. However, it's difficult for PA Hazards 'as an organisation' to exert an influence; it's more about the ability of individual steering group members to drive change on their home turf and the Commission's abilities to influence the member states. In these regards, PA Hazards has an unclear role, which also means the PAC has a weak mandate. Neither PA Hazards as a whole nor the PAC have any formal mandate in respect of the countries in the collaboration or the institutions involved in these countries (or not involved, but whose participation would be desirable). There is also a potential for further development of the collaboration between PA Hazards and the Commission, and within the Commission.

It is important for PA Hazards to have an active control group, especially in the strategic area. Because there is **no single** clear procurer and recipient of PA Hazards efforts, and the work is 'internally controlled' rather than 'demand-driven', proactive involvement is required from the key individuals that are on the 'inside'. It is largely these key employees' own commitment that governs the extent to which useful results are generated by PA Hazards work. It's a matter of 'elbowing in' rather than waiting to be invited to contribute to various decision-making processes.

There is also a need to broaden perspectives by introducing more innovation and skills beyond that already represented in the steering group. This can be done by holding workshops in connection with steering group meetings to which additional skill sets are invited.

A kick-off meeting was held when work at PA Hazards began. A similar major meeting should be held for following up results thus far with discussions concerning future priorities with additional interested parties invited from the countries concerned, and a broad participation from Swedish civil authorities, researchers and flagship projects. For reasons of cost and organisation, such a meeting could be held in two stages, beginning with an introductory/preparatory meeting.

In our opinion, work on the three-year plan (aka strategic plan) has proceeded well, and that the same approach should also apply to the upcoming period. However, it should be more clearly emphasised that the three-year plan is only a strategic plan, while the one-year plans are more detailed work plans. Long-term priorities gain grassroots support in the countries concerned through the three-year strategic plan. The strategic plan also provides guidance for PAC and other key people within PA Hazards. We have not had the opportunity to make any assessment of a draft strategic work plan for 2018 onwards, because the work of the three-year plan is delayed due to lack of resources. However, based on the interviews and the document review in general, it is important to continue the strategic work, create clearer long-term priorities and further develop how work with these should be communicated.

Based on the analysis above, we submit the following recommendations concerning improvements to current coordination, collaboration and communications processes for the policy area, so that PA Hazards work can evolve and objectives be better achieved:

- Baltic Sea cooperation should be given higher priority within the Government Offices of Sweden and at the Swedish Environmental Protection Agency.
- KemI and HaV [Chemicals and the Swedish Agency for Marine and Water Management] should be given a clear assignment in the letter of authorisation (and funding) as regards involvement by national authorities in PA Hazards. This is a necessary condition if their efforts are to enjoy the influence their content justifies.
- It's important that the government's planned national network for the partial Baltic Sea strategy objective 'Save the Marine Environment' be given a stable form and structure and that conditions are provided for stronger links to the EU Marine Strategy Framework Directive and the EU Water Framework Directive.
- ***At the beginning of the next three-year period, the PA Hazards steering group should hold a reflection seminar for the presentation of results thus far and discussions concerning future priorities with additional interested parties invited from the countries concerned, and broad participation from Swedish civil authorities, researchers and flagship projects.***
- ***The three-year plan for PA Hazards should be given the distinct character of a strategic plan, with details concerning implementation set out in annual work plans.***
- ***PA Hazards should explore opportunities to expand resources for policy coordination at SEPA from 1.5 to 2.0 full-time positions, among other things to increase initiatives within strategic***

development, dissemination of results and the implementation of a reflection seminar and road shows.