

# The North Sea Advisory Council



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**Scotland, UK**

Minister Eskil Erlandsson  
Ministry for Rural Affairs  
103 33 Stockholm  
Sweden

4 July, 2014

Dear Minister,

## **Dumping of contaminated dredged material in the Kattegat**

The Skagerrak and Kattegat Working Group of the North Sea Advisory Council (NSAC) sent a letter to the Swedish Agency for Marine and Water Management on 26<sup>th</sup> February 2014 on the said topic. The letter was written in light of, in our view, the macabre trade-offs that have been expressed in a permission given by a court to the municipality of Falkenberg (Land and Environmental Court at Vänersborg, M-1600-12) to dump dredged contaminated material within an area closed for fishing for the protection of cod and the authority's approach whereby they have chosen not to appeal against an obviously incorrect given permission.

In the letter to the authority the view of the Working Group was expressed in the following way: An environmental policy that allows such dumping (contaminated dredged material) while at the same time establishing areas to protect cod (and prohibiting fisheries) is perverse and simply does not make sense.

As expressed to the Swedish Agency for Marine and Water Management we would like to express our opinion that we find it a serious contradiction in terms where areas are closed for the protection of cod and then the dumping of contaminated dredged material is allowed within the same areas.

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We also would like to highlight that we find it extremely strange that the authority in its answer (28<sup>th</sup> April 2014) says that the reason for not appealing the permission given was in the light of an earlier judgement given by the Supreme Environmental Court (M 8025-09). However, we note that in that case the dredged material was not contaminated.

We note that the Swedish Agency for Marine and Water Management has sent its reply to NSAC also to the Swedish government since “legislative changes in the direction expressed by the NSRAC can only be decided by the Swedish government”. We urge the Swedish government to make proposals preventing adverse effects when applying fisheries and environmental policies alongside.

Yours sincerely,



Niels Wichmann  
Chairman, Executive Committee

