

What's the problem with fish stocking?

Belief coalitions in Sweden's alien species
policy

Thomas Lind

CONTENTS

1. INTRODUCTION.....	4
1.1. Purpose and research questions.....	5
1.2. Demarcation	6
1.3. Research method	6
2. THEORY	8
2.1. Operationalization.....	11
3. EMPIRICAL ANALYSIS.....	13
4. DISCUSSION.....	18
5. CONCLUSION	20
WORKS CITED.....	22
6. ATTACHMENTS	23
6.1. Attachment 1: Referral (original form in Swedish).....	23

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1. INTRODUCTION

The introduction of alien populations¹ into an area can have unforeseen and adverse effects on the local ecosystem. The effects are not confined to the ecological – they can also directly affect the quality of life for people living in the area. In some cases the species introduced can be potentially dangerous for humans, introducing new diseases or pathogens to the local flora and fauna. In other cases, the damage can be economic, affecting businesses that depend on those very natural resources (e.g., large-scale fishing, sports fishing, tourism). There are a number of [intentional and unintentional] ways in which alien populations can be released into a local ecological system.

Fish stocking is one example of an intentional release of stocks of fish (sometimes from an alien population) into a local ecological system. Research conducted by Laikre et al. (2006) demonstrated that this kind of intentional release can be problematic for biodiversity on an ecosystem, species, and genotype level.

While most solutions to the cardinal problems in this area of study originate in research in the natural sciences, part of the solution lies in the political arena. Research must be conducted and results analyzed; subsequently, the political process can be initiated. Policies need to be developed and adopted by national governments in cooperation with local, regional, national, and international actors (both governmental and non-governmental) in what could be described as a multi-level governance policy arena, making the policy process more complicated. This type of policy arena amplifies the need for coordination and clear areas of competence and jurisdiction.

Within the policy subsystem of alien species and genotypes, there are substantial problems associated with lack of coordination among different government authorities, both horizontally and vertically. In some cases, the problems also involve competence and jurisdiction. This means that more than one government

¹ Non-indigenous species, or "non-native," plants or animals.

authority may consider itself responsible for a certain fish-stocking policy or geographic area, which creates overlapping areas of competence that lead to inefficiency. It also means that no government authority may consider itself responsible for a specific subsystem policy issue and/or geographic area; this situation leads to a gap in jurisdiction which in turn leads to inefficiency in that particular area (Naturvårdsverket 2008). There are also no common agreed-upon definitions of terms. For example, different terms are used in different reports and are both presented and understood differently by different actors. Knowledge about fish stocking and its consequences also differs among actors, as does the view of problems within the policy subsystem and specific solutions to those problems. Sandström (2010) argued that current Swedish policy in this area is vague, and this vagueness leaves room for different interpretations and provides significant leeway (intentional or not) to street-level bureaucrats.

All these problems within the policy subsystem resulted in the need for a new policy. In December 2008, the national Swedish Environmental Protection Agency issued a report on a national strategy for alien species and genotypes. This report was issued for referral to various local, regional, and state actors, including government agencies, county administration boards (CABs), universities, and select civic associations.

1.1. Purpose and research questions

The purpose of this paper is (a) to identify the different beliefs/views of the problem of alien genotypes in general and (b) to determine whether fish stocking affects genetic biodiversity within the policy subsystem² of alien species and genotypes to better predict possible future changes to the policy subsystem. Presumably, the national strategy for alien species and genotypes and referral answers from various actors will enable us to get a clearer picture of the different beliefs/views of the problems that exist within the policy subsystem. Weible (2009) stated that shared beliefs are an antecedent to the formation of coalitions. Knowledge gained from this study will provide us with greater understanding,

² A subunit of a policy domain, characterized by a functional/substantive dimension and a territorial dimension (Sabatier & Weible 2007).

which in turn might increase the likelihood of predicting future changes to the coalition structure within the policy subsystem and, in the longer term, future policy changes.

To fulfill this purpose, the following questions were asked:

- 1) How is the policy problem viewed in the national strategy for alien species and genotypes report with regard to (a) alien genotypes' effect on genetic biodiversity in general and (b) fish stocking's effect on genetic biodiversity?
- 2) What do the different referral answers have to say with regard to (a) whether alien genotypes have an effect on biodiversity on a genotype level and (b) whether fish stocking has an effect on genetic biodiversity?

1.2. Demarcation

This study focused on the problem formulation in the national strategy for alien species and genotypes report and in the referral answers. The reason for this demarcation was the assumption that a shared view of the problem of alien genotypes is a prerequisite for any meaningful prediction of future coalitions and changes within the policy subsystem. Any future analysis of, for example, proposed policy measures must be based on a shared view of the problems. Weible (2009) concluded that without this shared view, we cannot be certain that the proposed policy measures are aimed at solving the same problem.

1.3. Research method

The research employed a qualitative analysis of the national strategy for alien species and genotypes report and the referral answers from various state and civic actors. The actors in the policy subsystem were categorized into one of four different categories depending on how they view the problem of alien genotypes' effect on genetic biodiversity in general and fish stocking's effect on genetic biodiversity.

The referral was sent to seventy-four referral bodies consisting of state and civic actors on December 22, 2008 (see attachment 6.1 - referral). As of February 27, 2009 (the due date for the referral answers), thirty-two referral bodies (forty-three percent) had provided a referral answer. For government agencies, providing a

referral answer was compulsory, even if it just stated that the agency had no opinion on the issue. For other agencies, CABs, and civic actors, providing a referral answer was not compulsory.

2. THEORY

The advocacy coalition framework (ACF) is a theoretical framework for describing policy processes, changes in these policy processes, and different beliefs and advocacy coalitions within a policy subsystem. It is particularly adept at explaining policy processes that:

[...] deal with “wicked” problems – those involving substantial goal conflicts, important technical disputes, and multiple actors from several levels of government

- Sabatier & Weible 2007 (quoting Hobbe & Peterse), p. 189.

It is assumed that different actors that share an interest in a certain issue will form coalitions to advocate their cause or view of reality. A policy field can be quite large, spanning several subsectors that are hierarchically ordered beneath the overarching policy system. Each of these different subsectors may or may not form a policy subsystem, depending on rules for determining what constitutes a policy subsystem (Sabatier & Weible 2007).

According to Sabatier and Weible (2007), a policy subsystem is mainly defined by its scope. The most important task is to determine the geographic and substantive scope of the different coalitions that make up the various coalitions within the subsystem. Another factor to consider is the different legal and institutional structures that span the policy subsystem. A policy system (or subsystem) also needs actors.

An advocacy coalition is a group of individual actors that share a common belief system.³ Usually these networks of actors have an expertise within the area of the policy subsystem and want to influence public policy within this area. An advocacy coalition is also defined as agencies, research institutions, and interest groups that

³ A belief system is a set of mutually supportive beliefs. The beliefs may be religious, philosophical, ideological, or a combination of these (Weible 2009).

have subunits specializing in the policy subsystem topic. The degree to which policy actors interact is also a good measure of whether an advocacy coalition exists. To be classified as an advocacy coalition, some form of “non-trivial” coordination on the topic of the policy subsystem among the policy actors must exist (Sabatier & Weible 2007). Thus, for successful formation, an advocacy coalition must have (a) shared beliefs and (b) non-trivial coordination. This study focused on different actors’ shared beliefs regarding the problem.

Actors within a policy subsystem that have shared beliefs and views of the problem within the policy subsystem are part of a belief coalition. These belief coalitions are an important factor in predicting [changes to] future advocacy coalitions within a policy subsystem. Understanding them will enable us to predict future policy processes and their outcomes within the policy subsystem (Schön & Rein 1994; Weible 2009).

The ACF assumes three levels of individual belief systems that are shared among policy participants. At the deepest level are the deep core beliefs. These are beliefs that are extremely difficult to change; they are often a product of socialization during childhood. They include broad and normative ontological assumptions, such as the role of markets vs. government and liberty (Sabatier & Weible 2007). The right/left scale of traditional politics is a good example of deep core beliefs.

The next level is policy core beliefs. These are deep core beliefs specifically applied to an entire policy subsystem. Policy core beliefs do not always overlap with deep core beliefs (Sabatier & Weible 2007). For example, a policy participant who is normally not an advocate of environmental politics in general (here: a deep core belief) might be interested in sports fishing and therefore more environmentally friendly in his policy core beliefs (with regard to sports fishing-related policies) than in his deep core beliefs. Sabatier and Weible (2007) argued that policy core beliefs, usually a product of deep core beliefs, are also very difficult to change.

Normally, policy participants within an advocacy coalition share the same policy core beliefs. Sometimes policy participants can hold different opinions on certain subsystem-wide policy proposals. These opinions are then labeled policy core

policy preferences (Sabatier & Weible 2007). They can be described as a kind of secondary belief (see below) that is subsystem-wide in scope.

The third level is called secondary beliefs. These beliefs are less than subsystem-wide and address, for example, detailed rules, budgetary applications, and the view of seriousness and causal effects of a problem in a certain area (Sabatier & Weible 2007). For instance, some participants within an advocacy coalition might view a problem within the policy area as more serious than other participants do; they might also have differing views on the effect this has on the surrounding geographic area/society/other policy areas. According to Sabatier and Weible (2007), these secondary beliefs should not be as difficult to change as deep core and policy core beliefs.

Since deep core beliefs and policy core beliefs are resistant to change, the different ontological perspectives that result from these beliefs, and the so-called “devil shift”⁴ change in actual policy and beliefs of advocacy coalitions, are difficult to reconcile.

One of the ways in which the ACF allows for changes in beliefs is policy-oriented learning. This occurs when the policy participant’s beliefs change due to experiences and/or new information. Although deep core beliefs and policy core beliefs are very difficult to change, secondary beliefs are more susceptible to change through policy-oriented learning (Sabatier & Weible 2007).

A more fundamental way of belief change comes from a shock external to the policy subsystem (Sabatier & Weible 2007). An external shock can be, for example, a change in government or some form of disaster that in some way alters the way the policy subsystem functions. A change in government can lead to a change in the political agenda or focus public attention on key issues concerning the policy subsystem. It can also change the balance of power within the policy subsystem (e.g., strengthening the cause of a previously weaker coalition within the policy subsystem or weakening the cause of the dominant coalition).

⁴ Meaning that people have a tendency to view their political opponents as less trustworthy and more powerful than they actually are (Sabatier & Weible 2007).

2.1. Operationalization

Using the ACF as a basis for analysis of the national strategy for alien species and genotypes document, as well as the referral answers, a chart was created detailing different belief coalitions within the policy subsystem of alien species and genotypes. This was accomplished in two steps.

First, the national strategy report was qualitatively analyzed to determine whether the problems of alien genotypes' effect on genetic biodiversity in general and fish stocking's effects on genetic biodiversity were described. The result of this analysis was the deciding factor determining into which of the four different belief coalitions the different agencies responsible for the national strategy report were categorized (for the categories, see the paragraph below).

Second, the referral answers were divided into four categories on the basis of how the respondents perceive the problem of alien genotypes' effect on genetic biodiversity in general and whether fish stocking has an effect on genetic biodiversity: (1) alien genotypes are viewed as a problem for genetic biodiversity in general and fish stocking is viewed as a problem for genetic biodiversity; (2) alien genotypes are not viewed as a problem in general for genetic biodiversity and fish stocking is viewed as a problem for genetic biodiversity; (3) alien genotypes are viewed as a problem in general for genetic biodiversity and fish stocking is not viewed as a problem for genetic biodiversity; and (4) alien genotypes are not viewed as a problem in general for genetic biodiversity and fish stocking is not viewed as a problem for genetic biodiversity. Those referral answers that did not mention alien genotypes as a problem in general with respect to genetic biodiversity or fish stocking's effect on genetic biodiversity were not categorized into any of the four categories.

Based on these four categories, the referral answers were categorized into one of the four categories illustrated in figure 1.

<p>Alien genotypes are not viewed as a problem in general for genetic biodiversity</p> <p>Fish stocking is viewed as a problem for genetic biodiversity</p>	<p>Alien genotypes are viewed as a problem for genetic biodiversity in general</p> <p>Fish stocking is viewed as a problem for genetic biodiversity</p>
<p>Alien genotypes are not viewed as a problem in general for genetic biodiversity</p> <p>Fish stocking is not viewed as a problem for genetic biodiversity</p>	<p>Alien genotypes are viewed as a problem in general for genetic biodiversity</p> <p>Fish stocking is not viewed as a problem for genetic biodiversity</p>

Figure 1: Model used to categorize actors within the policy subsystem into belief coalitions.

3. EMPIRICAL ANALYSIS

The actors of the steering committee that produced the report consisted of the Swedish Environmental Protection Agency, National Board of Forestry, Swedish Board of Agriculture, Swedish Customs, Swedish Species Information Centre, and the Swedish Board of Fisheries (SBF). The inclusion of the SBF in the steering committee indicates that the strategy also relates to fish and marine life, or at least that the SBF has been one of the principal actors in shaping the problem formulation and other policy aspects of the report.

The report mentions problems with fish stocking on several occasions, both more generally and on a genotype level. Three of the eight pilot species mentioned are marine-dwelling – brook trout, American comb jelly, and American lobster (Naturvårdsverket 2008). Of the three, the brook trout is a fish.

This quotation from the conclusion of the report can serve as an example that the problem of alien species and genotypes also comprises biodiversity on a genotype level (my translation):

The effects of invasive alien species can be ecological – by way of the decline or marginalization of domestic species; or genetic – in the form of alterations to the genome of domestic species.

- Naturvårdsverket 2008, p. 14.

There is also an awareness that the introduction of alien species when it comes to fish is mostly intentional (i.e., fish stocking) and that the spread of alien species and genotypes is harder to contain in aquatic environments because of the interconnectedness of waterways (Naturvårdsverket 2008).

Still, there are inconsistencies in the [national strategy for alien species and genotypes] report regarding fish-stocking policy. On the matter of fish stocking, it is written (my translation):

Information should be given to anglers, fishery management, and fish farmers regarding the importance of using [Swedish] native stock when fish stocking.

- Naturvårdsverket 2008, p. 86.

The quotation above exemplifies the importance of not using alien species.⁵ However, it also shows a lack of understanding or knowledge (or perhaps unintentional inconsistency) with regard to different localities within a country having different genomes. Consequently, introduction of the same species from a different area within the same country can have an adverse effect at the genotype level of the species native to the locality. Ultimately, the national strategy for alien species and genotypes report viewed alien genotypes as a problem for general biodiversity and fish stocking as a problem for biodiversity on a genotype level. Next, we analyze the referral answers.

Two questions were asked when deciding into which of the four belief coalitions each referral body would be categorized based on their referral answer: (a) Is biodiversity on a genotype level viewed as a problem in the referral answer? (b) Is fish stocking viewed as a problem for genetic biodiversity? The referral bodies were subsequently placed into one of the four categories based on the variations in their answers (yes/no, yes/yes, no/yes, and no/no) to the questions above (see figure 2).

⁵ In this case meaning a species introduced in Sweden after 1800.

		Alien genotypes mentioned as a problem?	
		No	Yes
Alien genotypes mentioned as a problem in regard to fish stocking?	Yes		<ul style="list-style-type: none"> - CAB Kalmar - Swedish Board of Agriculture* - Swedish Board of Fisheries* - Swedish Customs* - Swedish Environmental Protection Agency* - Swedish Forest Agency* - Swedish Maritime Administration* - Swedish Species Information Centre*
	No	<ul style="list-style-type: none"> - CAB Västmanland 	<ul style="list-style-type: none"> - CAB Norrbotten - National Organization for Sparetime Cultivators - National Veterinary Institute - Scientific Council for Biological Diversity - Swedish Association for Hunting and Wildlife Management - Swedish Museum of Natural History - Swedish University of Natural Sciences - University of Gothenburg - University of Stockholm

* = Actor was a part of the steering committee (and thus one of the authors) of the national strategy report

Figure 2: Belief coalitions within the policy subsystem of alien species and genotypes.

The following agencies and civic associations did not mention alien genotypes as a problem for biodiversity on a genotype level or fish stocking as a problem for genetic biodiversity in their referral answers and, consequently, did not fit into any of the above four categories: CAB Blekinge, CAB Jönköping, CAB Skåne, CAB Södermanland, CAB Uppsala, CAB Västra Götaland, National Board of Trade, Swedish Chemicals Agency, Swedish Maritime Administration, Swedish Meteorological and Hydrological Institute, Swedish National Board of Housing, Swedish Pet Trade Organization, and Swedish Transport Agency.

It was also assumed that the agencies that participated in either the steering committee or working party for the national strategy for alien species and

genotypes report agreed with the policy in the report and, therefore, they were placed in the yes/yes category (upper right). The Swedish Maritime Administration, being a part of the working party only, did not mention alien genotypes as a problem for genetic biodiversity in general or fish stocking as a problem for genetic biodiversity, so including it in the yes/yes category might be considered presumptuous; however, since it is part of the working party of the national strategy for alien species and genotypes report, it was nevertheless included in the yes/yes category.

Two major belief coalitions with respect to the policy of problem formulation can be discerned – one that mentions alien genotypes as a problem in general for genetic biodiversity, but does not mention this issue in regard to fish stocking, and one that considers alien genotypes to be a problem to general biodiversity on a genotype level and fish stocking to be a problem for genetic biodiversity (see table 1).

Table 1: Belief coalitions within the policy subsystem of alien species and genotypes.

Belief coalition 1	Belief coalition 2
Actors that consider alien genotypes to be a problem for genetic biodiversity in general, as well as in regard to fish stocking (the yes/yes – upper right – category in figure 2)	Actors that consider alien genotypes to be a problem for genetic biodiversity in general, but not in regard to fish stocking (the yes/no – lower right – category in figure 2)
<ul style="list-style-type: none"> • CAB Kalmar • Swedish Board of Agriculture • Swedish Board of Fisheries • Swedish Customs • Swedish Environmental Protection Agency • Swedish Forest Agency • Swedish Maritime Administration • Swedish Species Information Centre 	<ul style="list-style-type: none"> • CAB Norrbotten • National Organization for Spare Time Cultivators⁶ • National Veterinary Institute • Scientific Council for Biological Diversity⁷ • Swedish Association for Hunting and Wildlife Management • Swedish Museum of Natural History • Swedish University of Natural Sciences • University of Gothenburg • University of Stockholm
Only the CAB of Kalmar is not part of the steering committee or the working party for the national strategy for the alien species and genotypes report.	A much more diverse group of government and civic actors. One CAB, two civic associations, one council (part of the Swedish Environmental Protection Agency), one government institute, one state-owned museum, and two universities.

Only one referral answer specifically mentioned alien genotypes as not being a problem in general for genetic biodiversity and fish stocking not to be a problem for genetic biodiversity. Therefore, no belief coalition was considered to exist within this category (no/no – or lower left category in figure 2). In the upper left category (yes/no in figure 2), there were no actors at all, meaning that this category can also be disregarded.

⁶ Author's own translation. No official translation could be found. Swedish name is *Fritidsodlarnas riksförbund*.

⁷ Author's own translation. No official translation could be found. Swedish name is *Vetenskapliga rådet för biologisk mångfald*.

4. DISCUSSION

Regarding how the policy problems of alien genotypes' effect on biodiversity in general and how fish stocking's effects on genetic biodiversity are viewed in the national strategy for alien species and genotypes report, the data suggest that the report has a good grip on these issues and also takes them seriously for the most part. When discrepancies arise, they seem to be from a lack of knowledge on specific subjects rather than a failure to understand the seriousness of the problem in general.

The referral bodies are concentrated in one major group that mentioned alien genotypes as a problem for genetic biodiversity in general but did not mention fish stocking as a problem for genetic biodiversity. Two referral bodies – one that specifically mentioned that alien genotypes are not a problem for genetic biodiversity in general and that fish stocking does not affect genetic biodiversity and one that mentioned alien genotypes as a problem both in general and in regard to fish stocking – were the only two answers outside this group that mentioned alien genotypes in regard to genetic biodiversity. Fourteen referral bodies did not mention alien genotypes as a problem in their referral answer.

In accordance with the purpose of the study, two belief coalitions can be outlined within the policy subsystem. The first comprises actors who view alien genotypes to be a problem for genetic biodiversity in general and fish stocking to be a problem for genetic biodiversity. The other belief coalition is composed of those who view alien genotypes as a problem for biological diversity with regard to alien species in general, but do not regard fish stocking as having an effect on genetic biodiversity.

Any future advocacy coalition(s) will likely be drawn from one of these two belief coalitions. Of the referral bodies that sent in a referral answer, a majority reported that alien genotypes are a problem in general in relation to the alien species policy subsystem. Seventeen of thirty-two referral answers considered this to be a problem, and eight of those seventeen also considered fish stocking to affect genetic biodiversity.

Looking at the referral answers, there seems to be little knowledge of (or interest in) whether fish stocking affects genetic biodiversity outside the steering committee and the working party of the national strategy report. Only one actor outside these groups specifically mentioned fish stocking as having an effect on genetic biodiversity.

Based on these findings, future policy within this policy subsystem is likely to include some form of measure regarding how to handle alien genotypes and how alien genotypes are connected to biological diversity on a species level. It is unlikely that this policy will include measures specifically targeting fish stocking.

5. CONCLUSION

Fourteen referral bodies that sent referral answers did not mention either the problem of alien genotypes for genetic biodiversity in general or fish stocking as having an effect on genetic biodiversity (apart from one state actor – but one actor cannot form a belief coalition with itself). The size of this group of referral bodies indicates a substantial amount of uncertainty regarding these issues.

The method used worked well for gathering the data, but the limitations of the data available are nevertheless evident in that a large portion of the referral answers cannot be categorized at all. Fifty-seven percent, or forty-two of the referral bodies that were sent a referral, did not provide a referral answer. This could be considered a problem; on the other hand, one could argue that had those bodies thought the issue to be of concern, they would have provided a referral answer. Nevertheless, a response rate of forty-three percent must be considered quite low, which could affect the reliability and external validity of the study. The fact that government agencies were required to provide an answer to the referral means that a larger proportion of the referral answers came from government agencies, especially in comparison to the proportion of government agencies among the referral bodies.

These uncertainties indicate a need for further research into the beliefs about problems within the policy subsystem that these “neutral” actors actually hold. This would preferably be done via interviews with representatives of these actors or a questionnaire sent to them. Such a study could also be expanded to include other actors within the policy subsystem. The interview/questionnaire could include questions related to those with whom the respondent has had contact regarding this issue; this would facilitate the possibility of getting a picture of the relationships between different actors within the policy subsystem, which might enable us to predict future advocacy coalitions even more reliably.

As a further step in this research, it would also be of value to analyze proposed policy measures and policy goals to obtain more in-depth knowledge of the policy

core policy preferences and secondary beliefs of the different actors either within the policy subsystem as a whole or within each belief coalition.

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6. ATTACHMENTS

6.1. Attachment 1: Referral (original form in Swedish)

Nationell strategi och handlingsplan för främmande arter och genotyper samt EU-kommissionens meddelande KOM (2008) 789 om en EU-strategi för invasiva arter

Remissinstanser:

1. Kommerskollegium
2. Krisberedskapsmyndigheten
3. Kustbevakningen
4. Tullverket
5. Länsstyrelsen i Stockholms län
6. Länsstyrelsen i Uppsala län
7. Länsstyrelsen i Södermanlands län
8. Länsstyrelsen i Östergötlands län
9. Länsstyrelsen i Jönköpings län
10. Länsstyrelsen i Kronobergs län
11. Länsstyrelsen i Kalmar län
12. Länsstyrelsen i Gotlands län
13. Länsstyrelsen i Blekinge län
14. Länsstyrelsen i Skåne län
15. Länsstyrelsen i Hallands län
16. Länsstyrelsen i Västra Götalands län
17. Länsstyrelsen i Värmlands län
18. Länsstyrelsen i Örebro län
19. Länsstyrelsen i Västmanlands län
20. Länsstyrelsen i Dalarnas län
21. Länsstyrelsen i Gävleborgs län
22. Länsstyrelsen i Västernorrlands län
23. Länsstyrelsen i Jämtlands län
24. Länsstyrelsen i Västerbottens län
25. Länsstyrelsen i Norrbottens län
26. Stockholms universitet
27. Uppsala universitet
28. Göteborgs universitet
29. Skogsstyrelsen
30. Jordbruksverket
31. Statens Veterinärmedicinska Anstalt
32. Livsmedelsverket
33. Fiskeriverket

34. Sveriges Lantbruksuniversitet
35. ArtDatabanken
36. Centrum för Biologisk Mångfald
37. Naturvårdsverket
38. Vetenskapliga rådet för biologisk mångfald
39. Kemikalieinspektionen
40. SMHI
41. Boverket
42. Banverket
43. Vägverket
44. Sjöfartsverket
45. Transportstyrelsen
46. Konsumentverket
47. Naturhistoriska Riksmuseet
48. Arbetsmiljöverket
49. Sveriges Kommuner och Landsting
50. Fiskbranschens Riksförbund
51. Fritidsodlingens Riksorganisation
52. Greenpeace
53. Gröna Näringens Riksorganisation
54. Jägareförbundet
55. Lantbrukarnas Riksförbund
56. Livsmedelsföretagen
57. LRF Skogsägarna
58. Naturhistoriska museers samarbetsorganisation
59. Svenska Naturskyddsföreningen
60. Riksförbundet Svensk Trädgård
61. Skogforsk
62. Skogsindustrierna
63. Sportfiskarna
64. Svensk Handel
65. Sveriges Fiskares Riksförbund
66. Sveriges Fiskevattenägarförbund
67. Sveriges Kust- och insjöfiskares förbund
68. Sveriges Ornitologiska Förening
69. Sveriges Trädgårdsanläggningsförbund
70. Sveriges yrkesfiskares ekonomiska förening
71. Vattenbrukarnas Riksförbund
72. Villaägarnas Riksförbund
73. WWF
74. Zoobranschens Riksförbund

Remissvaren beträffande den nationella strategin och handlingsplanen ska vara inkomna till Miljödepartementet senast den 27 februari 2009. Remissvaren beträffande EU-kommissionens meddelande ska vara inkomna till Miljödepartementet senast den 5 februari 2009, för att svaren ska kunna beaktas i förberedelserna för förhandlingarna i Ministerrådet. Vi ser helst att vi får remissvaren i elektronisk form via e-post, varav vi önskar ett svar i word-format. Svaren ska skickas till registrator@environment.ministry.se. Skicka gärna en kopia till Lars.Berg@environment.ministry.se.

Rapporterna kan laddas ned från adresserna

http://www.regeringen.se/download/acef8c06.pdf?major=1&minor=118078&cn=attachmentDuplicator_0_attachment

http://www.regeringen.se/download/3dcf6869.pdf?major=1&minor=118078&cn=attachmentDuplicator_1_attachment

http://www.regeringen.se/download/d407de84.pdf?major=1&minor=118078&cn=attachmentDuplicator_2_attachment

http://www.regeringen.se/download/006868b9.pdf?major=1&minor=118078&cn=attachmentDuplicator_3_attachment

I remissen ligger att regeringen vill ha synpunkter på förslagen eller materialet i rapporterna. Regeringen önskar särskilt synpunkter på ansvarsfördelning och samordning av åtgärder inom Sverige respektive Europeiska Unionen.

Myndigheter under regeringen är skyldiga att svara på remissen. En myndighet avgör dock på eget ansvar om den har några synpunkter att redovisa i ett svar. Om myndigheten inte har några synpunkter, räcker det att svaret ger besked om detta.

För **andra remissinstanser** innebär remissen en inbjudan att lämna synpunkter.

Eventuella frågor under remisstiden kan ställas till
Lars Berg tfn 08-405 17 93.

Råd om hur remissyttranden utformas finns i Statsrådsberedningens broschyr "Svara på remiss. Hur och varför?". Broschyren kan beställas från Regeringskansliets förvaltningsavdelning, Information Rosenbad, 103 33 Stockholm eller hämtas från nätet: www.regeringen.se

Annika Nilsson

departementssekreterare

Kopia till

Fritzes kundservice, 106 47 Stockholm
Riksdagens utredningstjänst