



Document title	The Baltic Shadow Plan: For the future of the Baltic Sea. NGO's key asks for the revised BSAP
Code	4-4
Category	CMNT
Agenda Item	4 - Update of the Baltic Sea Action Plan
Submission date	26.2.2020
Submitted by	CCB and WWF
Reference	Document 4-1 Agreement on HELCOM objectives for the updated BSAP; Agenda Item 4 in general

Background

In the process of updating the HELCOM Baltic Sea Action Plan, NGOs across the Baltic Sea region have together formulated recommendations across all themes of the current BSAP to be considered by the Contracting Parties of HELCOM. The shadow plan recommendations are to complement actions that are currently missing, still to be addressed or need to be altered to deliver the founding goal of the BSAP to “restore the Baltic marine environment to a good ecological status by 2021.”

We are in the middle of a biodiversity and climate crisis. The coming decade will be decisive for safeguarding biodiversity and our future. A collapsed Baltic cod population is the most alarming indication yet, signalling the very real need to change and manage the entire ecosystem where we continue to fish, build and extract. **By implementing the existing nature protection policies and stepping up the political commitments, we can deliver that change – but we must act now.**

We call on all the Baltic Sea Area countries to take up their responsibility to immediately and effectively follow up the commitments of the 2007 HELCOM BSAP and further strengthen those by adopting a revised 2021 Action Plan that aims to:

- (1) **lead on the protection and conservation of the marine ecosystems** on which livelihoods and all marine sectors ultimately depend,
- (2) **urge all actors to intensify efforts** to safeguard marine biodiversity and recovery of the Baltic Sea and,
- (3) **invite and engage civil society, stakeholders and rights-holders** to work together towards a healthy and sustainably used Baltic Sea.

Action requested

The Meeting is invited to take note of the NGO's recommendations provided in the Shadow Plan to the BSAP and utilize these accordingly in developing content for the updated Action Plan.

MARCH 2020

THE BALTIC SHADOW PLAN: For the future of the Baltic Sea

NGO's key asks for the revised Baltic Sea Action Plan (BSAP)

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*Coalition
Clean Baltic*





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THE BALTIC SEA WE WANT

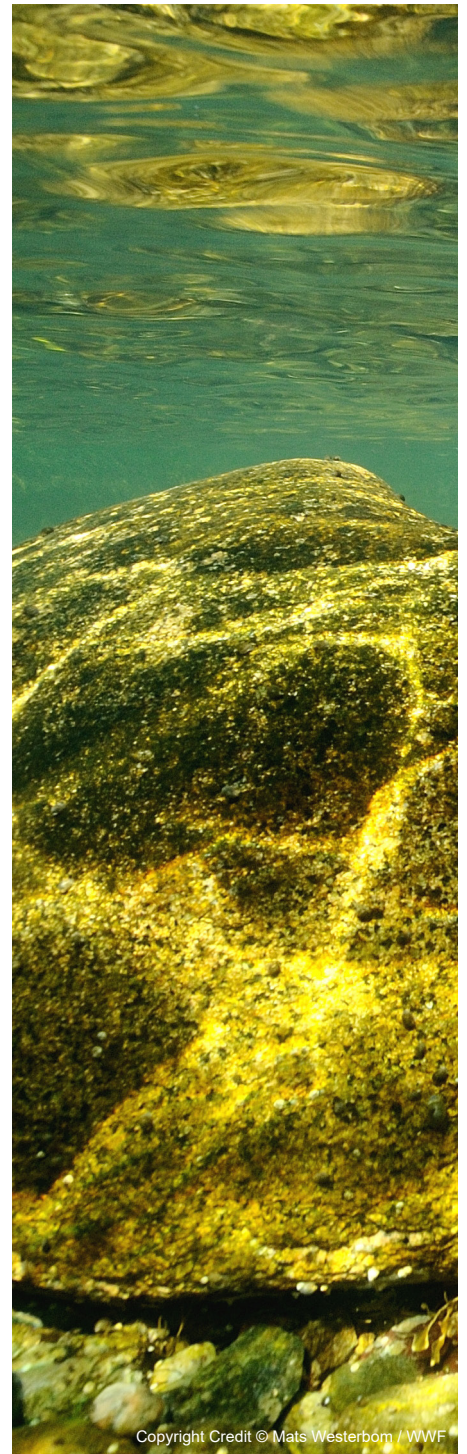
The Baltic Sea Action Plan (BSAP) adopted in 2007, had the goal to restore the Baltic marine environment to a good ecological status by 2021. However, the Contracting Parties to the Helsinki Convention are nowhere near achieving this goal. On any given day, marine life in the Baltic Sea has to navigate increasingly acidic waters, while also dodging trawling nets and abandoned fishing gear, sea bed disturbances and extraction activities, noisy and heavily polluting ships, marine infrastructure, invasive species, diseases from farmed fish, eutrophication and anoxic zones, construction, tourism, and hazardous substances including plastics.

On top of this anthropogenic burden, the Baltic Sea is dealing with new challenges linked to human-induced climate change and extreme weather. Climate change is altering our marine ecosystems and will continue to do so if we do not act immediately. The new BSAP needs to address this problem and help initiate actions that cut greenhouse gas emissions in all countries around the Baltic Sea and ensure the Paris Agreement's target, to keep global heating below 1.5 °C, is met.

The HELCOM vision and the overall goal of the BSAP (2007) is "A healthy Baltic Sea environment, with diverse biological components functioning in balance, resulting in a good environmental/ecological status..." Yet good environmental status (GES) cannot be reached without effective implementation of the ecosystem approach¹ across all the segments of the Action Plan, multiple maritime and land-based sectors, and activities within the Baltic Sea catchment area.

Healthy marine and coastal life and habitats are essential for ecosystem resilience to ecological and climate breakdown. **We are dependent on marine and coastal ecosystems to be healthy and rich in fauna, flora, and genetic biodiversity so that they can perform their natural functions, which is crucial to supporting all life on earth.** The ocean acts as a vital carbon sink, regulates weather patterns, provides oxygen and pumps nutrients around the globe. We depend on it – for crucial life systems and as a protein source, even for those who live inland, far from the sea.

1 - The comprehensive integrated management of human activities based on the best available scientific knowledge about the ecosystem and its dynamics, in order to identify and take action on influences which are critical to the health of marine ecosystems, thereby achieving sustainable use of ecosystem goods and services and maintenance of ecosystem integrity". (HELCOM/OSPAR Bremen Ministerial Declaration, 2003)



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We are in the middle of a biodiversity and climate crisis. The coming decade will be decisive to safeguard biodiversity and our future. A collapsed Baltic cod population is the most alarming indication yet, signalling the very real need to change and manage the entire ecosystem where we continue to fish, build and extract.

With brave and sufficient political commitment, we can deliver that change, but we must act now.

We call on all the Baltic Sea Area countries to take up their responsibility to immediately and effectively follow up the commitments of the 2007 HELCOM BSAP and further strengthen those by adopting a revised 2021 Action Plan that aims to:

- 1. Lead on the protection and conservation of the marine ecosystems** on which livelihoods and all marine sectors ultimately depend,
- 2. Urge all actors to intensify efforts** to safeguard marine biodiversity and recovery of the Baltic Sea and,
- 3. Invite and engage civil society, stakeholders and rights-holders** to work together towards a healthy and sustainably used Baltic Sea.

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BIODIVERSITY

An alarming decrease in biodiversity of Baltic Sea marine habitats has been observed. It poses risks of irreversible damage to the ecosystem through its endangered resilience and by the loss of species. To counter this, we need an ambitious Baltic Sea Action Plan that protects marine species and habitats, that includes fish stock recovery areas, eliminates destructive fishing and includes legally binding sea recovery targets. By 2030, at least 30% of the Baltic Sea should be highly or fully protected. THE BALTIC WE WANT has enough pristine and wild marine and coastal areas to act as safe havens for animals and plants and are removed from harmful human activities.

BEING CONCERNED about overall continued decrease in biodiversity of marine habitats and species, WE CALL upon Governments of HELCOM Contracting Parties to ensure:

- No national security interests should contradict conservation targets and security interests cannot disregard environmental objectives.
- No new oil and gas exploration, extraction or distribution should be allowed in the Baltic Sea.
- Benefits of Marine Protected Areas (MPAs) beyond nature protection should be included as the basis of ecosystem-based approach in Maritime Spatial Planning (MSP).
- All major infrastructure projects, new and old, should apply for a permit before commencing and prove it will not lead to the degradation of biodiversity.
- Environmental Impact Assessment (EIA) in a transboundary context should become obligatory for any large development activities in the Baltic Sea Area, such as sediment and mineral extraction, marine aquaculture, construction of ports, pipelines and wind farms.
- Regular updates of the 'HELCOM Red List of Baltic Sea underwater biotopes, habitats and biotope complexes and the 'HELCOM Red List of Baltic Sea species in danger of becoming extinct' should be conducted.

STRESSING that marine protected areas very often lack management that addresses the cumulative impacts on biodiversity and conservation objectives resulting in no protection ("paper parks"), WE REQUEST that:

- Effective Marine Protected Area (MPA) management plans be put in place and implemented, covering different targeted species and habitats, with an emphasis on biodiversity restoration.
- Adequate recovery and at least 10% scientific reference areas be established in all HELCOM MPAs to enable baseline monitoring of biodiversity protection and restoration.
- Sufficient long-term funding for regular control and monitoring as well as for evaluation of management effectiveness, should be secured for all MPAs.
- HELCOM MPA management plans should be regularly updated based on the monitoring, control and evaluation of the effectiveness of management.

BEING AWARE of the observed decrease in areas of existing HELCOM Baltic MPAs, WE URGE that:

- A target of reaching at least 30% effectively protected Marine Protected Area (MPAs) in the Baltic Sea should be set aside by latest 2030.
- HELCOM Baltic Marine Protected Area (MPA) Guidelines ([Rec 35-1](#); [BSEP105](#)) become legally binding by clear reference in Art.15 of the Helsinki Convention or by developing a new Annex on Nature Conservation to the Convention.
- Policy instrument to control changes in HELCOM Marine Protected Areas (MPAs) leading to degradation of its conditions (changes of borders, changes in management plans, approval of harmful activities etc.) should be developed.
- All HELCOM Marine Protected Areas (MPAs) should include fully closed zones (complying with IUCN 1a category) or be closed in their entirety, depending on the conservation objectives and needs of the specific site.
- Any removals of marine life within HELCOM Marine Protected Areas (MPAs) should be limited to secure a functional ecosystem and intact food web.
- No new infrastructure projects should be allowed within HELCOM Marine Protected Areas (MPAs) unless it can be proven to have no impact on the conservation objectives of the site or on the site's integrity.

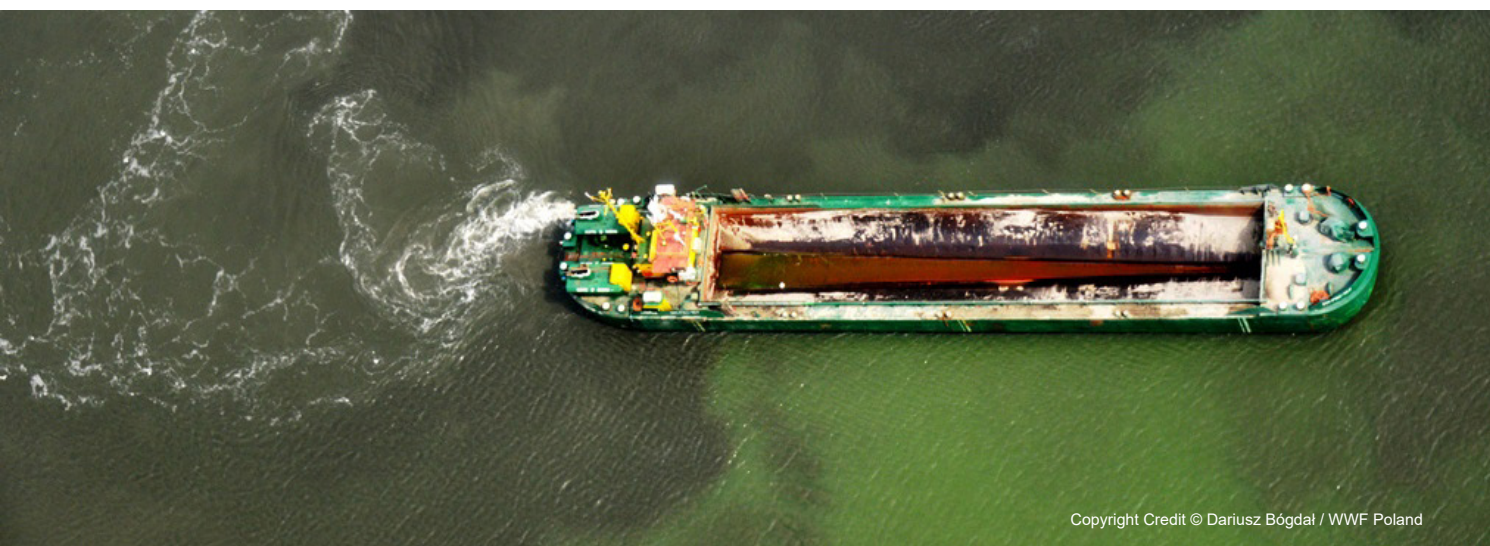


ALSO STRESSING that no socio-economic considerations should prevail over ecosystem interests, WE CALL for:

- National and transboundary maritime spatial plans (MSPs) be based on the ecosystem-based approach and implement the principles set in [Rec 28E-9, Guidelines on transboundary consultations, public participation and co-operation](#) and [for the implementation of ecosystem-based approach in MSP](#) in the Baltic Sea Area.
- Set maritime spatial plans to significantly contribute to mitigate the impacts from blue economy activities exerted on MPAs and include individual MPAs and MPA networks as an integral part of MSP.
- Ensure that future development and activity undertaken in the Baltic Sea Area does not undermine the health and integrity of the sea, therefore ensuring that it:
 - » Restores, protects and maintains diverse, productive and resilient marine ecosystems,
 - » Provides social and economic benefits for current and future generations; and
 - » Is based on clean technologies, renewable energy and circular material flows.
- Set clear, measurable, consistent targets and guidelines to ensure development is consistent with and within the limits of the planetary boundaries.
- Develop scientific knowledge and data on the potential risks and impacts associated with marine investments, as well as adopt indicators to monitor maritime sectors.
- Halt environmentally harmful subsidies and use the public support to create incentives to supporting nature conservation.

RECOGNIZING impacts on marine life by anthropogenic underwater noise, WE ALSO URGE that:

- For impulsive sound of any source, a clear threshold for the whole Baltic Sea based on best available standards should be set and implemented with immediate effect.
- Any activity generating impulsive sound should be coupled with adequate mitigation measures.
- Measures to reduce noise pollution within and outside MPAs for noise sensitive species should be put in place, such as annual seasonal closures, reduced speed, re-routing, sonar regulation, and buffer zone around the MPAs for impulsive noise.
- Generally, best practices for mitigating both impulsive and continuous underwater noise should be promoted and put in place throughout the Baltic Sea Area for the implementation of the HELCOM Regional Action Plan on Noise. Examples are:
 - » Application of noise abatement systems during pile driving as demonstrated by Germany,
 - » Mandatory use of bubble curtains or other mitigation measures when exploding Unexploded Ordnance (UXOs),
 - » Ban air gun surveys for oil and gas exploration as it does not comply with climate goals,
 - » Use of alternative technology for other geological surveys if needed,
 - » Setting safe frequency range when using military sonars,
 - » Slow steaming for commercial ship traffic as demonstrated by Canada to only reduce noise, but also emissions.
- Sound emission through leisure boats should be reduced with immediate effect, e.g. through speed reduction, and the limitation of sonar use in certain areas and to frequencies above 150 kHz.



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ACKNOWLEDGING deteriorating impacts of activities impacting seafloor integrity, WE CALL for:

- Setting a ban on seabed mining in the Baltic Sea and for HELCOM parties to support a global ban on deep sea mining.
- Any seafloor impacting activities in areas of low resilience and recovery rate such as Vulnerable Marine Ecosystems (VME) areas and Ecologically or Biologically Significant Areas (EBSAs) to be banned.
- Dredging and sediment extraction activity to be banned in important and sensitive habitats to minimise releasing and resuspension of contaminants and nutrients.
- Any sediment extraction in the Baltic Sea without a full Environmental Impact Assessment (EIA) should be banned.
- Sediment extraction should only be permitted in locations with clear understanding of ecosystem impacts, requiring compensatory measures and following up post extraction monitoring in all extraction permits.
- Bottom contacting fishing gears in the Baltic Sea being only allowed when it can be shown that they do not hinder any country from reaching the goals defined in the Marine Strategy Framework Directive (MSFD) for seafloor integrity.
- Countries steer towards circular economy of minerals and deposits, based on sustainable ecological design and the principles of reduce, reuse, recycle, refuse, refurbish and repair.
- Promoting on-land recycling of dredged materials for construction and beach nourishment purposes instead of dumping at sea.

IN LINE with SDG 14.4 target to end overfishing, WE URGE for halting overexploitation of Baltic fish stocks by:

- Explicitly stating the Baltic Sea Action Plan (BSAP) / Marine Strategy Framework Directive (MSFD) goal of Good Environmental Status (GES) should be reached when implementing Common Fisheries Policy (CFP) requirements, in particular to reach all primary criteria for commercial species of the GES - MSY, precautionary biomass levels and a size and age structure indicative of healthy fish stocks.
- Implementing ecosystem-based approach to fisheries management as defined by the Convention on Biological Diversity (CBD), MSFD, and stated as a requirement in Common Fisheries Policy (CFP).

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- Improving at sea and landing controls across the Baltic Sea to reduce illegal, unreported and unregulated (IUU) fishing, especially discarding, including better cross-country coordination.
 - Implementing fish stock recovery areas.
 - Maintaining the spawning closures for the Eastern and Western Baltic cod which were agreed by the EU in October 2019 and inviting EU and Russia to agree upon their extension also to cover Russian flag vessels.
 - Improve assessments on data poor stocks, to the extent possible using ecosystem-based assessments which take into account not only multi-species fish interaction but also wider ecosystem food web interactions.
 - Fishing with low impact gear should be prioritised as well as fishing for human consumption over that for fishmeal (e.g. in the sprat and herring fisheries).
 - Improving assessment of all recreational fisheries to fully incorporate this pressure in stock assessments and continue to monitor also the non-quota/Total Allowable Catch species.

BEARING IN MIND that almost ten million individual cods per year are illegally thrown overboard in the Baltic Sea², WE CALL to stop discarding through the following measures:

- Allowing only fishing that can meet the requirements of the EU Landing Obligation and unwanted bycatches.
- Using public support only for fisheries with low impact gear and that fish for human consumption.
- Implementing fully documented fisheries using Remote Electronic Monitoring (REM) systems with cameras in order to secure full compliance with Landing Obligation requirements as well as combating illegal fishing activities (IUU).

To halt/minimise the bycatch of birds and mammals, WE ALSO CALL to:

- Steer towards low impacting fishing gear and continue to invest in research and development of bird and marine mammal safe fishing gear.
- Put in place effective monitoring and reporting systems for bycatch of birds and mammals by urgently implementing the HELCOM Roadmap on fisheries data in order to assess incidental bycatches and fisheries impact on benthic biotopes in the Baltic Sea.
- Investigate options for more cost-effective bycatch monitoring to better estimate bycatch, particularly targeting high risk fisheries (gillnet).

BEING CONCERNED about the status of the critically endangered Baltic Sea harbour porpoise population, WE URGE to:

- Ensure that bycatch of the critically endangered Baltic Sea harbour porpoise is minimised – within MPAs designated for the harbour porpoise through appropriate assessments and permitting procedures for fishing activities, as well as outside MPAs, through use of effective bycatch mitigation methods such as acoustic deterrent devices and alternative fishing gear.
- Ensure that the quantity and quality of harbour porpoise prey species in the Baltic Sea is enough to allow the population to recover from the current depleted state.

2 - ICES Special Request Advice EU request for further information on the distribution and unavoidable bycatches of eastern Baltic cod, Baltic Sea ecoregion. Published 13 November 2019.

- Implement and strengthen coordinated national monitoring programs in all Baltic Sea range states and undertake regular large-scale surveys of population abundance and distribution.
- Include the Baltic Sea harbour porpoise population as critically endangered on the national red lists of all Contracting Parties.
- The use of acoustic deterrent devices should be accompanied by a thorough monitoring concept to make sure bycatch reduction is met and no harm is done.

TAKING INTO ACCOUNT that the safe ecological limit for seal species in the Baltic Sea has not been achieved WE FURTHER URGE to:

- Limit expansion of seal hunt and apply precautionary approach when considering any national or international management measures of seals (data insufficiency, current stock status and cumulative effects).
- Allowing compensation of gear damage from seals via European Maritime Fisheries Fund (EMFF) or respective national funding possibilities.
- Developing and implementing non-lethal mitigation measures for fisheries interactions (support for seal safe fishing gear).
- Using the existing United National Environment Programme (UNEP) Protocol for the Scientific Evaluation of Proposals to Cull Marine Mammals.

STRESSING the threatened status of European eel, WE CALL for the ban of active eel fishing in the Baltic Sea at all life stages, with a stepwise approach consisting of:

- Joint Baltic-wide monitoring and management plan for European eel, to be set in place as soon as possible, ensuring the effectiveness of fisheries closures and restrictions for any life stage by 2022.
- Phasing out targeted eel fishery in the Baltic catchment, starting with stopping all recreational fishing by 2022 at the latest and all commercial eel fisheries by 2025.
- Eradicating unintentional human induced eel mortality by requiring that all dams and pumping stations on priority eel rivers should have installed mitigation measures for up and down stream migration before 2024.



BEING CONCERNED by the threatened status of other migratory fish species in the Baltic Sea Area WE URGE to remove the migration barriers in rivers by:

- Ensuring barrier-free access to rivers for migrating fish species by updating existing permits with such requirements, in accordance with Water Framework Directive (WFDs) goals on continuity.
- Addressing old and inefficient hydropower plants, through permitting procedure for old and new hydropower plants with compulsory mitigation measures.

BEING AWARE of the importance of biological invasions into the Baltic Sea Area WE REQUEST to stop introductions of alien species (including pathogens) by:

- Establishing open data sources on the distribution and characteristics of invasive species (monitoring), including co-operation between different regions.
- Implementing the Ballast Water Management Convention (BWMC) in all countries around the Baltic Sea.
- Making information publicly available for risk assessment.
- Reducing marine litter as a vector of the distribution of invasive species.
- Intensifying research on efficient non-toxic, anti biofouling methods for ships.

BEING CONCERNED by the observed effects of climate change on Baltic Sea's fragile biodiversity and ecosystem, WE URGE to halt all activities which cause an overshoot of 1,5 °C global warming threshold and, to this end, CALL for:

- Completely phasing-out of burning fossil fuels in the Baltic countries.
- Phasing out financial flows and investments into production of oil and gas to reach the EU energy plan 2030 goal to align with the 1.5°C threshold.
- Developing a recommended roadmap for decommissioning and adapting existing fossil gas installations and related infrastructure to achieve the 2035 phase-out date.
- Setting a regional road map to achieving climate neutrality (net zero emissions) in the Baltic Sea Area by 2040.
- Investing in low carbon energy technologies and energy efficiency and enhanced carbon sinks.
- Developing and prioritizing zero-emission alternatives to fossil-based fuels, including energy saving, and non-fossil energy carriers.
- Setting a target for doubling CO₂ removal through carbon sequestration within the Baltic region by 2030, in particular through ecosystem restoration of terrestrial, coastal and marine habitats that build climate resilience and help tackle the biodiversity loss.
- Introducing long-term strategy to move towards sustainable food consumption and production in the region and set up flagship initiatives to transition to sustainable food systems to address the region's global footprint.



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EUTROPHICATION

Even though over-fertilisation by nutrients of the Baltic Sea has been recognized decades ago, it still remains its main environmental problem with 97% of the sea area affected by eutrophication. HELCOM Contracting Parties have repeatedly failed to implement ambitious targets to reduce nutrient input into the Baltic. Reaching a Baltic Sea not affected by eutrophication cannot be compromised by continued and deliberate losses of nutrients from point and diffuse water- and airborne sources. It is therefore essential that measures to minimise the input of additional nutrients are ambitious and immediate. THE BALTIC WE WANT has a balanced nutrient cycle and is not affected by eutrophication.

HAVING IN MIND underutilised nutrient reduction potential from both point and diffuse sources, WE URGE that:

- Land-based runoff reduction measures should not be substituted with sea-based ones.
- The Precautionary principle should be applied as the basis for decision-making on sea-based measures.
- Projects to be supported with public funding should only be allowed if they pass a clear EIA that includes considerations to nutrient leakages and losses.
- No permits should be given for any activity that may lead to further deterioration of the state of the Baltic Sea by applying [ECJ ruling C-461/13 \(Weser case\)](#) and respective EIA/SEA as a basis for permitting new activities

BEING CONCERNED by losses of valuable nutrient resources from agriculture and aquaculture, that cause significant eutrophication of surface, coastal and marine waters, WE URGE to curb agricultural inputs by:

- Promoting closed nutrient loops/recycling in agriculture and introducing compulsory nutrient balance as a statutory measure for any farms.
- Stopping intensive farming on wet lowland in the vicinity of rivers and watercourses to decrease leakage of nutrients and allow for climate mitigation measures (temporary flooding) and biodiversity purposes.
- Gradually banning new industrial animal farms for poultry, pigs and cattle by stepwise reduction of the number of animals in industrial farms and conversion to better livestock with species-appropriate methods, outdoor-based farms and overall reduction in livestock farming.
- During a phase-out period of fur farming, ban fur farming within Baltic Sea Area and require the use of Best Available Technology (BAT) for management of manure and biowaste at fur farms.
- Prohibit open sea aquaculture cages in the Baltic Sea, and develop and promote BAT for sustainable aquaculture in the Baltic Sea Area based on land-based circular solutions.

FOLLOWING the implementation of sewage discharge from ferries and passenger ships, WE URGE that no nutrient discharge should be allowed from any shipping vessel in the Baltic Sea by ensuring that:

- Adequate reception facilities for ship-generated sewage in all ports or adequate and standardised onboard treatment plants are in place.
- All discharge of food waste (including comminuted or ground) from shipping into the Baltic Sea is prohibited and the Baltic Sea states suggest respective amendments to MARPOL Annex V³.
- The discharge of grey water from passenger ships into the Baltic Sea is banned.
- Sewage discharge is banned and extended to cover not only passenger ships but all commercial vessels in the Baltic Sea.

BEING CONCERNED by the impacts of dry bulk transportation of fertilisers by the Baltic Sea shipping, WE ALSO URGE that:

- Packaged or containerised transportation should be only allowed based on Best Available Technology (BAT) (also the use of reusable or recyclable packaging instead of plastic bags).
- No hold washing discharge should be allowed into the Baltic Sea to prevent cargo-generated nutrient inputs.
- HELCOM to introduce above ban within the Baltic Sea Area as a pilot for International Maritime Organisation (IMO)/global action.

BEING AWARE of existing and earlier unidentified point sources of nutrients, WE REQUEST:

- Setting up a system to identify “Hot Spots” of nutrient input into the Baltic and applying subsequent targeted measures to reduce the source.



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³ - Annex V of the MARPOL Convention aims to eliminate and reduce the amount of garbage being dumped into the sea from ships. Its terms include all kinds of food, domestic and operational waste that are likely to be disposed of during the normal operation of the ship.

HAZARDOUS SUBSTANCES

The harm to the environment generated through hazardous substances becomes more complex with every year as old substances persist, and new substances are released into the environment. THE BALTIC WE WANT is surrounded by countries, which have adopted and enforced a Zero-pollution strategy with clear goals to prevent exposure to harmful chemicals in air, soil and water to ensure a non-toxic environment for current and future generations.

BEING AWARE of estimated⁴ annual loss of 27,000 tonnes of plastic to the Baltic Sea, WE URGE that no litter should be introduced to the Baltic Sea directly or as riverine input by applying the following measures:

- Forbidding the use of single-use plastic items in the retail chains across the Baltic Sea Area and promote sustainable reusable alternatives, including adequate and environmentally sound waste management.
- HELCOM countries committing to support a new globally binding agreement on marine plastic pollution under the UNGA to eliminate the input of plastic into nature by 2030.
- Including the topic "marine litter" in learning goals, school curricula and school materials.
- Establishing extended producer responsibility schemes for all plastic products with the aim to eliminate plastic "leakage" to reduce/minimise plastic packaging.
- Reducing emissions and inputs of microplastic and avoiding the use of primary microplastic.
- If possible, removing existing marine litter, and particularly derelict fishing gears from the sea, and specifically from MPAs.
- Developing regional scientific measurement and reporting schemes to improve knowledge on plastic input into the Baltic Sea, as well as scale and impact of marine plastic pollution on biodiversity and socio-economic aspects in the Baltic Sea Area.
- As a last resort, applying constructed wetlands, when relevant, as a final step at medium- and smaller scale Municipal Waste Water Treatment Plants to stop nano- and microplastics and pharmaceuticals.
- Any direct discharges of stormwater into surface water bodies without any treatment should be drastically reduced, for example by using permeable hard surfaces, green buffer zones, constructed wetlands and trapping wetland trenches/ponds along roads.
- Establishing the "Fishing for litter" approach to compensate fishermen for removal of marine debris caught by fishing gear and bringing it on shore for safe disposal.

TAKING INTO ACCOUNT significant annual input of plastic from lost nets WE ALSO URGE that no commercial or recreational fishing gears should be lost or discarded into the Baltic Sea by:

- Revising HELCOM actions to address Abandoned, Lost and Derelict Fishing Gears through a joint mitigation policy for the Baltic Sea region.

4 - [The marine plastic footprint : towards a science-based metric for measuring marine plastic leakage and increasing the materiality and circularity of plastic, IUCN, 2020](#)



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- Revising and applying recommendations from the [MARELITT Baltic project](#) on how to approach derelict fishing gear (mapping of hot spots and prevention methods for gear loss).
- Allowing recreational fishing with commercial style gears only if it is linked with a registration and reporting system that includes reporting of lost or replaced gears.

IN LINE with the EC "[Strategic Approach to Pharmaceuticals in the Environment](#)" WE FURTHER CALL that no human or veterinary pharmaceuticals be deliberately discharged into the Baltic Sea through the following measures:

- Revising HELCOM Rec 28E/5 on Municipal Waste Water Treatment Plants, introducing advanced treatment steps.
- Setting up mandatory take back systems for online pharmacies as a compulsory requirement in permits to operate as a pharmacy.

BEING CONCERNED that the growing waste-to-energy sector in the Baltic Sea Area represents significant source of airborne deposition of hazardous substances WE URGE that no harmful energy solutions should be promoted by:

- Applying waste/resource management hierarchy to decide on new waste incinerators, including priority to recycle and reuse.

TAKING INTO ACCOUNT several incidents involving hazardous substances in recent years, WE ALSO URGE to disclose any information by countries about contamination and accidents with hazardous substances by:

- Providing public access to national monitoring data on hazardous substances into the water and sediments.
- Setting adequate financial and mitigation action in place to handle ad hoc hazardous substances leaching incidents in the marine environment.

BEING AWARE that underwater explosions also lead to the release of harmful substances through incomplete burning WE CALL for the following actions:

- Old ammunition should – if possible – be removed from the Baltic.
- Underwater explosions of the unexploded ordinances (UXOs) should be avoided and limited based on an EIA and only with respective mitigation plans concerning noise and hazardous substances.

MARITIME ACTIVITIES

The multitude of anthropogenic maritime activities puts great strain on the Baltic marine ecosystems. In the BALTIC, WE WANT the HELCOM Contracting Parties to be aware of the cumulative impact of those activities and have put regionally coordinated, Ecosystem-Based Maritime Spatial Plans within and across countries' borders to address the cumulative effects over a long-term perspective. These spatial plans are to ensure marine ecosystems are maintained healthy and deliver to nature conservation, are resilient towards the impacts of climate change and contribute to a sustainable use of the marine environment.

WE CALL to stop any negative impact through commercial shipping and recreational boating by:

- Recommending 'slow steaming' as a Best Available Technology (BAT) in Ecologically and Biologically Sensitive Areas (EBSAs) including a buffer zone for vessels around Marine Protected Areas (MPAs).
- Halting leakage of other harmful/hazardous substances from shipping activities, e.g. related to tank washing.
- Forbidding the release of scrubber wastewater of open and half open systems into the Baltic Sea.
- Reducing GHG emissions from Baltic shipping by 100% by 2050.
- Minimising disturbances by recreational boating by enforcing no-go zones and restricted anchoring zones.

WE ALSO CALL on further improvement in maritime safety to avoid shipping accidents and oil spills by:

- Developing and agreeing upon the methodology, and consequently carrying out, regular risk assessments of maritime accidents and associated spills of oil and other hazardous substances.
- Proposing and reviewing additional Associated Protection Measures (APM) for the Baltic Sea Particularly Sensitive Sea Area (PSSA).
- Including Russian waters in the Baltic Sea Particularly Sensitive Sea Area (PSSA).

WE URGE for continued development of oil spill preparedness and response capabilities by:

- Ensuring that all aspects of oil spill response, including at sea response, shoreline response and oiled wildlife response, are fully acknowledged and integrated into one command structure for planning, preparedness and response purposes.
- Further developing sensitivity mapping according to international standards, including the recognition of offshore and nearshore wildlife vulnerabilities outside of protected areas.
- Ensuring national and regional response preparedness standards that allow for the recognition and full integration of professional NGOs into nationally funded training and exercise programmes.

WE ALSO URGE to stop any negative impact through offshore oil and gas installations by:

- Phasing-out offshore oil and gas production in the Baltic Sea.

WE FURTHER URGE for no delay in transparently controlling and implementing the next steps of the Ballast Water Management Convention (BWMC) through the following steps:

- Providing transparent information that is easily accessible on the authorities responsible for controlling the implementation of the Ballast Water Management Convention (BWMC).
- Pointing out loopholes within the Ballast Water Management Convention (BWMC) and adapt the controls.
- Carrying out regular chemical quality tests of ballast water treated in ballast water management systems that make use of active substances, so as to ensure that in water meeting the D-2 standard of the Convention the maximum allowable discharge concentrations indicated in the instructions provided by the manufacturer are not exceeded at the time of discharge into the environment.

WE REQUEST that no discharge from ship cargo holds should be allowed in the Baltic Sea Area by:

- Developing and implementing control and reduction of hazardous substance in cargo residues discharge, to prevent that paraffins and other cargo residues or tank washing substances are found on beaches/along the coastline.
- Developing and requiring mandatory port reception facilities is put in place and is always used for hold washing water.



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IMPLEMENTATION

Unsatisfactory implementation has consistently delayed and prevented the recovery of the Baltic Sea. A greater coordinated and accountable effort for national targets to be accomplished within the set deadlines is needed for the next period of the BSAP. Previous review⁵ of the current BSAP has shown that it is not sufficient merely to set targets if they are not underpinned by concrete and comprehensive action, along with clear accountability. Two main goals should be set for all segments of the BSAP:

1. Curtailing biodiversity loss in the catchment and sea in the next 5 years and bending the curve on biodiversity loss by 2030 in the region,
2. Achieving climate neutrality (net zero emissions) in the Baltic Sea Area by 2040.

For THE BALTIC WE WANT this needs to be implemented by 2025, so that we have reached the vision by 2030.

WE URGE for effective recommendations for action, evaluation and monitoring on BSAP implementation through:

- Replacing HELCOM recommendations with targeted actions that have set deadlines to monitor and evaluate progress made over time.
- Using Article 20.2 of the Convention to develop new implementation mechanism, e.g. 'implementing recommendation'.
- Setting a new HELCOM monitoring and evaluation system with measurable targets and repercussion for not meeting agreed set commitment deadlines.
- Establishing relevant financial needs to ensure that actions can be met, e.g. setting up targeted funding schemes for BSAP implementation.

WE STRESS that no activities that are not in line with Ecosystem Based Management should be allowed and:

- Ecosystem Based Management⁶ should be set as a fundamental principle in Article 3 of the Helsinki Convention.

5 - [WWF Baltic Sea Action Plan Scorecard 2018](#)

6 - An ecosystem-based approach to planning and management recognizes the full array of interactions within the ecosystem and acknowledges that the carrying capacity of the marine ecosystem against human pressure as well as the marine space available are limited. It considers the marine space as an integrated system providing a variety of sea uses and services.

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