



Baltic Marine Environment Protection Commission

Seventh Meeting of the Ad hoc Drafting Group for the
Updated Baltic Sea Action Plan

DG BSAP 7-2021

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Background

This documents includes editorial comments by Sweden on the draft updated BSAP ([document 4-1](#) from HOD 60-2021)

Action requested

The Meeting is invited to take note of the comments.



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Swedish editorial comments on document 4-1 for HOD60

Sweden would like to propose the following minor editorial comments regarding the doc 4-1 that was presented at the Helcom HOD60 meeting.

Overall we see a need for a professional English language check (someone with knowledge in the field), including checking repetitive text, contradictive information, use of terms such as “we” or not, etc. A few examples are indicated in the list below.

Sweden support that cross referencing the actions should be limited to actions in other segments but that this could be limited to a symbol to highlight that an action contributes to a different segment. However, Sweden feels that a better solution would be that actions are cross-referenced to management objectives to clarify what management objective each action contributes to.”

p.9: “In this regard, a central overarching aspect is applying the ecosystem approach to the management of these multiple pressures and their cumulative impact”. **EA is referred to in many places; no need to mention under current state, (refers to management, and could be placed in “reaching the desired state” if not repeated)**

P.10 the brackets: good, should be kept

p.14 Despite a slight long-term improvement, over 96% of the region is still below good status with regard to eutrophication, including all of the open sea area and 86% of the coastal waters, as shown by a HELCOM assessment for the years 2011-2016. Recently, the eutrophication status has deteriorated in four of the 17 Baltic Sea sub-basins, which might be attributed to temporal variability in climate and hydrography.

Commented [LR1]: (was? this was in 2016...)

Commented [LR2]: Could be deleted, sounds like speculation

p.22 As shown by the latest Helcom assessments of pollution by heavy metals, organic contaminants and radioactive substances, the...

Commented [LR3]: Or delete this part of the sentence to shorten

“we” format is used eg. On p.22. to consider in language check.

p.22 For Cesium 137 good status will be reached before 2025 according to the indicator fact sheet. Sweden questions whether it is representable to mention this substance particularly before others?

p.23 1st para, should we refer to the Seabased segment? For example “actions related to the input from sea-based activities are addressed in the segment on...” Similarly 4th para. This since the segment is supposed to be (?) on mainly land based activities (as opposed to the seabased segment).

p.24 from “Because of the wide array of chemical substances ...” to the end of the para can be moved to “reaching the desired state”, merged with the part starting “Recurrent screening of contaminants in the marine...”

p.24 “HELCOM commits to developing an action plan for hazardous substances as a part of the regional strategic approach to strengthening the management cycle for hazardous substances and linking HELCOM activities with other relevant regional and global policies” : Update to be in line with the final formulation of the action.

p.27 maybe an explicit reference to RAP ML is useful since all the measures now are to be found there. It may be useful to refer to e.g. RAP UN, Nutrient recycle strategy in a similar way.

p.29 last para “about 40 percent of the Baltic Sea seabed is estimated to be potentially disturbed,” the preamble says “around half”

p.38. Climate change introduction is now longer than any other segment, and partly repetitive. Propose to shorten, for example consider deleting:

* the first para

* two last sentences of 2nd para

* part of 3rd para “~~are often not easy to understand and~~”

p. 38: Consider rephrasing (since the “one fits all” measure to climate change is e.g to reduce CO2 release...): Both climate change and other human-induced impacts and mitigation measures vary significantly between different regions in the Baltic Sea, ruling out **one-size-fits-all marine** management solutions ~~and that could be applied across the entire region.~~

p.40 2nd para, this sentence is repeated from the 1st para “HELCOM monitoring provides the necessary data needed for the regular assessments of the state of the Baltic Sea, as well as of the human pressures and their impacts on that state.

p.40 sentence needs language check: Sites with relevant long-term data records are maintained, whilst continuously making use of improved data collection techniques where appropriate, thus sustaining long-term data series needed to identify change over time.

P . 40 “Coordinated monitoring of physical, chemical and biological variables of the open sea of the Baltic Sea has been carried out since 1979.”

General: Programs or programmes? Both is used in this document