



LETTER: The future of the Baltic Sea requires full commitment by Heads of Governments and Cabinet Ministers of the Baltic Sea countries

Uppsala/Stockholm/Madrid, 22 February 2018

Dear Prime Minister/Head of Government

Dear Minister of the Environment,

The Baltic may be a small sea, but is of immense importance for its citizens, security, shipping and economic development, as well for its unique marine environment. Unfortunately, the precious marine environment is heavily degraded by eutrophication, overfishing and other human activities. For this reason, Baltic Sea issues are dealt with in numerous regional fora such as the Helsinki Convention for the Protection of the Marine Environment (HELCOM), the EU Strategy for the Baltic Sea region (EUSBSR) and others. Within these fora, schemes of regional cooperation and action plans have been developed, which in fact have come to be seen as good examples of global models. Some of these were highlighted at the High-level UN Conference to support the implementation of the Sustainable Development Goal 14.

On March 6, you and your representative will meet in Brussels to sign a new declaration under the Helsinki Convention to re-affirm your “strong commitment to strengthen the full implementation of the Baltic Sea Action Plan and the follow up declarations, by 2021”.

We, the environmental NGOs, Coalition Clean Baltic, Oceana and WWF have stated on several occasions, as observers in HELCOM, that we see a desperate need for a strong Baltic Sea Action Plan (BSAP) and for urgent implementation of the measures covered by the plan and beyond. However, the draft declaration to be endorsed at the HELCOM Ministerial Meeting offers little of this. This will be re-iterated in the WWF Scorecard report and CCB’s Civil Society Declaration, both to be presented at the Ministerial Meeting.

The institutional problem of political decision making in countries is making implementation of ambitious plans difficult as environmental ministers need their counterparts from other ministries to be meaningfully engaged in complex cross-cutting issues. The problems cannot be overcome by concentrating the efforts in playing with words in the Ministerial declaration. In each country, an ecosystem based, cross sectoral implementation approach involving Ministries of Finance, Agriculture, Fisheries, Transport, and the Environment is urgently needed.

We urge that you take the political leadership needed in addressing the flaws introduced in the declaration and hope the suggestions we raise will clarify the actions that need to be taken. We ask you to make your utmost to include your peers from other ministries in the discussion to finding the balance between competing economic interests and seeing the long term needed investment for the sake of the Baltic Sea and for the sake of our future region.

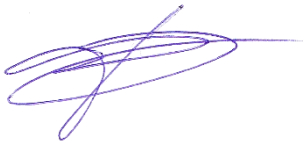
Let us work to moving from rhetoric to action and raise the political ambition as set out in 2007 to follow through in saving the Baltic Sea.

Measures to improve the Baltic Sea must be seen as an investment in the region's sustainable economic and social development. This is the only way to truly secure the healthy marine environment and its services we, collectively, so heavily depend on.

With this letter and enclosed Annex, we would like to draw your attention on the following specific topics which we see as the major flaws in the declaration you have been asked to sign. We will continue to monitor the progress by you and your government in the years approaching to achieving 2021 objective of Good Ecological Status.

Yours sincerely,

For Coalition Clean Baltic



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Executive Secretary

For OCEANA Europe



Lasse Gustavsson
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For WWF Baltic Ecoregion Programme



Håkan Wirtén
Chair of the Programme and CEO of WWF Sweden

Annex: Segment-specific asks and tasks

Eutrophication - the role of agriculture

Agriculture remains the biggest source of nutrient losses to the Baltic Sea as confirmed by the EU Court of Auditors (2016) and a large part is due to the current EU CAP which fails to provide concrete environmental and social benefits and lack incentives to efficiently preserve nutrients, both in crop production and animal farming. In addition, excessively generated manure, especially from cattle and other ruminants farming, contributes substantially to GHG emissions and hence climate change.

The HELCOM Copenhagen Ministerial Declaration of 2013 set a number of concrete actions to curb harmful side-effects of agricultural production on the Baltic environment. However, most of those still remain to be implemented and even more concerted dialogue with agricultural stakeholders, including farmers, is needed. Agriculture can contribute to the BSAP targets only through quantifiable and verifiable measures at source. Such measures include:

- Reduce nutrient surplus levels per hectare at field level, improve nutrient use efficiency set HELCOM limits for total fertilisation, introduce proper soil nutrient mapping and nutrient bookkeeping at farm level.
- Review, update and strengthen part II of Annex III “Prevention of pollution from agriculture” of the Helsinki Convention (1992).
- The CAP reform must transform to make provisions for the reduction of nutrient run-off as one of the key objectives of the policy to meet environmental and climate targets. The share of agri-environmental measures that support implementation of the agreed HELCOM commitments from 2007 and 2013 must increase to at least 20% of the budget.

Biodiversity and impacts on ecosystems

Today all assessed biotope complexes and over 25% of the biotopes and habitats are considered threatened. Four percent of the species are in danger of becoming extinct in the Baltic Sea, among which are also economically important fish species. Only one out of 17 biodiversity core indicators show good status in all assessed areas, six core indicators do not show good status in any of the assessed areas. We urge you to take strong actions to improve the status of the Baltic marine biodiversity with no further delay. The BSAP deadlines are right around the corner and the original deadline for forming an ecologically coherent network of MPAs is already passed by eight years.

Only a healthy marine environment can produce the ecosystem services we depend on and, further to this, be resilient in the face of large scale, human induced changes, like climate change. For these reasons it is of utmost importance to secure the following actions:

- Adopt the *HELCOM recommendation on the conservation of the most threatened biotope complexes, biotopes and habitats* with no further delay. The cause of this non-action is carried heavily by all countries and the marine environment.
- *Ecologically coherent and well-connected networks of efficiently managed MPAs* should form the core of the actions aimed at preserving biodiversity and the resilience of the ecosystems. Improvement is still needed both in *protection of areas within territorial seas, EEZs and transnational protection* of the sea areas shared by two or more countries.
- Efficient management plans and measures to limit human pressures inside MPAs need to be applied with special focus in protecting threatened species, habitats, biotopes and biotope complexes.

- The vast majority of the current MPAs suffer from little or no management. To redress this, the countries need to work collaboratively on; capacity building, direct support, and other measures to improve management, sustainable financing of MPAs, and ensuring that local people benefit from and contribute to MPAs management
- To ensure a true ecosystem approach planning of new MPAs should be an integral part of the MSP process

Seabed damage and disturbance

Seabed damage and disturbance are caused by multiple human activities which often result in permanent loss of a habitat type and decrease of the value of the area. Despite that at present only 1% of the Baltic Sea is estimated to be permanently lost and about 50% of the area is potentially disturbed - in almost half of the sub-basins the estimated disturbance is between 80-100%.

- Use *the precautionary approach* and take action to reduce human pressures in the most threatened and sensitive and heavily disturbed areas. This is the only way to avoid permanent losses from happening, in the environment and the coastal states' economies.
- Particular attention should be given to areas where *red listed species and habitats* are known to exist.

Biodiversity – the role of Fisheries

The 2013 Copenhagen Ministerial declaration set many clear targets for the improvement of the fish stocks in the Baltic Sea and to mitigate harmful effects of fishing in line with the EU CFP. Little progress has happened in the implementation of these agreements or improvement of the stocks, the environments and the species threatened by fishing activities. Regardless of those 2013 agreements and global efforts (SDG 14.4, 14.6) to halt overfishing and prohibit harmful fisheries subsidies by 2020, Baltic Sea countries continue overfishing by allowing fishing in part of the cod stock already at the edge of collapse, as well as fishing on the critically endangered population of European eel. Therefore, it is crucial that the following actions are implemented with no further delay:

- Contracting Parties must actively work jointly to safeguard the eel, reconsider *to ban active fishing for eel* and share best practise on removing migration obstacles up -and downstream.
- HELCOM countries need to ensure that all fishing gear used is selective and that sufficient mitigation measures are taken to *minimize bycatch*. Introduce sufficient bycatch monitoring of the fishing fleet, as stated in the MSFD, to get estimates of the actual bycatch rate in different fisheries.
- A comprehensive *Salmon River Management Plans* to address at least one weak wild salmon river in Sweden, Russia, Estonia, Latvia and Lithuania needs to be developed by 2019 and implemented urgently, to reach active protection in 2020, in accordance with HELCOM BSAP.
- The use of public funds to support businesses must be steered towards the *Best Available Technology* and best performers to drive constant improvements, with regard to supporting aquaculture operations and fishing gear development.
- Joint efforts to streamline data collection and catch reporting need to be developed, to enable impact assessment and the economic value of the recreational sector in fisheries

Maritime Activities

The Baltic Sea is one of the busiest seas in the world and shipping traffic is predicted to more than double by 2030. Much has been carried out by the Contracting Parties in the maritime segment of the BSAP and the number of pollution events from oil spills has decreased. However, there are several areas, where more action is needed:

- We urge you to collectively and individually prioritize the ratification and full implementation of the Ballast Water Management Convention.
- Progress still needs to be addressed to upgrading of *port waste reception facilities* for sewage discharges in passenger ports.
- There is a need for *integrating oiled wildlife into oil spill response / contingency planning*.
- Update *the action plan for the protection of the environment from offshore platforms* and *put into practice the zero discharge principles* which has been put on hold with no further notice.
- Handling of bulk fertilisers and collection of sewage from leisure crafts should be also evaluated and addressed with adequate mitigation.

Hazardous substances

The big problem for the Baltic Sea today and in the future is the ever-increasing emissions of chemicals that have not been risk-assessed, individually or in combination. Much is still unknown on how long exposure to low concentrations of chemical substances as well as combined with other contaminants, such as pharmaceutical residues in the sea gives for effects. In order to tackle this problem, it is increasingly important to:

- *Improve sewage treatment in municipal water treatment plants* by setting new regional standards with more advanced purification technologies to prevent chemical contaminants from being released into the water bodies. Two thirds of all wastewater around the Baltic Sea coast passes through 45 major wastewater treatment plants and mitigation applied at those will make a difference.
- Speed up in addressing the problem at the source through chemical regulation process, control chemicals in goods, green procurement, and develop a more systematic identification of new environmental pollutants.

For all HELCOM Contracting Parties to ratify and implement the UNEP 2013 Minamata Convention on mercury

- Enforce a regional ban on the use, storage, production and marketing of priority substances, such as endosulfan, pentaBDE and octaBDE,
- HELCOM's Objective for Hazardous Substances is implemented by updating the BSAP list of hazardous substances of specific importance for the Baltic Sea, to develop additional targeted measures for specific substances (e.g. pharmaceuticals)
- Develop a common harmonised methodology for monitoring *marine litter and particularly microparticles* from riverine inputs and address the sources of other major contaminants