



Document title	The Baltic Shadow Plan: For the future of the Baltic Sea. NGO's key asks for the revised BSAP – relevant for HELCOM GEAR
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Background

In the process of updating the HELCOM Baltic Sea Action Plan, NGOs across the Baltic Sea Region have together formulated recommendations throughout all themes of the current BSAP to be considered by the HELCOM Contracting Parties. These recommendations have formed the [Shadow Plan](#) and 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.” These recommendations have been presented to 2020 HELCOM Stakeholder Conference and following it [HELCOM 41-2020](#) that agreed to put the Shadow Plan forward to the HELCOM Working Groups for further consideration in the light of the BSAP update.

The general message of our joint Shadow Plan is as follows:

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, signaling 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 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:

Set two main goals for all segments of the BSAP

- **Curtailing biodiversity loss in the catchment area in the next 5 years and bending the curve on biodiversity loss by 2030 in the region**
- **Achieving climate neutrality (net zero emissions) in the Baltic Sea by 2040.**

Most of the topics raised in the Shadow Plan are relevant for the GEAR group, but some specific actions of significance are presented in this document and are suggested to be included/reflected in the update of the BSAP.

Action requested

The Meeting is invited to consider the recommendations provided in the Shadow Plan to the BSAP of relevance for HELCOM GEAR and utilize these accordingly in further developing content for the updated Action Plan.

The [Baltic Shadow Plan](#): For the future of the Baltic Sea. NGO's key asks for the revised BSAP – relevant for HELCOM GEAR

BIODIVERSITY

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

- 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.

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 ocean, 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.

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.

IMPLEMENTATION***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 Management¹ should be set as a fundamental principle in Article 3 of the Helsinki Convention.

¹ 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. Supported by the best available science and by participatory good governance, it addresses the cumulative effects of human activities on marine ecosystems over a long-term perspective.