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Germany welcomes the outcome of the Task Group. The document contains a concise compilation of the strengths and challenges of HELCOM.

However, we do not see that the structural proposal by the Task Group addresses all of the challenges outlined. The Task Group proposes 7 to replace the existing 6 working groups, which cannot be called a particularly “streamlined” result.

We still see overlapping topics between State and Fisheries group as well as between Pressure and Agriculture group. This would also lead to a duplication of work which we could avoid by introducing an alternative working structure. Besides, we doubt that the combination of HABITAT and MONAS issues would lead to a simplification since they deal with a number of separate issues.

Referring to the following section of the Outcome of HOD 45-12

3.46 The Meeting supported in principle the proposed new group, however stressing the importance of securing the proper coverage of components on nature conservation and biodiversity and that some further consideration should be given to how to combine and integrate the work of the monitoring and nature conservation expert communities within the new group. The Meeting requested the Secretariat to propose such integration elements to the Terms of Reference (ToR) of the group as well as to come up with a suggestion on how the name of the group could be better formulated so it reflects the role of the group.

3.47 The Meeting discussed the proposed new “Pressures” group and supported the establishment of the Group in principle. The Meeting considered including also other pressures and requested the Secretariat to outlay the pros and cons of both options.

We would like to stress that we of course respect the majority of Contracting Parties’ votes being in favour of the presented structure and thus leading to an adoption ‘in principle’. Additionally we are of course more than interested in the Secretariat’s proposals how to combine and integrate the work of the monitoring and nature conservation expert communities within the proposed group. We would nevertheless like to state that the fact, that this integration needs to be ‘developed’, might be a strong proof that combining the two groups is not self-evident, a logic or ‘natural’ development but a somewhat artificial approach.

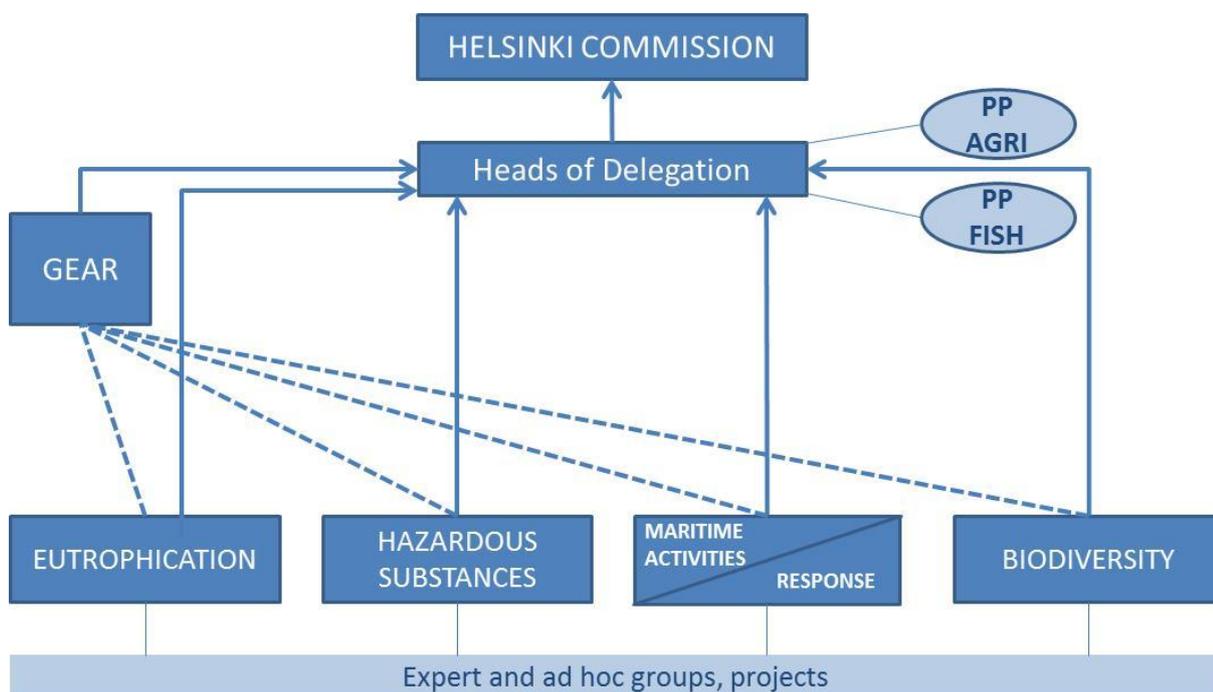
We would like to present our most relevant concerns as follows:

To provide a *negative* example of merging groups ‘for the sake of streamlining’ we refer to the OSPAR Committee of HASEC that has been established by merging the work on eutrophication, hazardous substances and monitoring and assessment and which could be comparable to the proposed pressure group. As a result, OSPAR HASEC has grown to a super group that has only few common issues and that has doubled its number of participants. In practice, the meeting agendas are again split into an eutrophication section and a hazardous substances section.

Having a look into the most relevant aspects of the Copenhagen Declaration as regards HABITAT and MONAS we are definitely not convinced of a sufficient number of issues which might be of *common* interest for both groups, i.e. HABITAT and MONAS. We also doubt the approach that has been expressed during the HOD meeting, guiding into a direction of ‘urging’ our experts into this new structure and this new way of thinking. From our perspective it might be the task of GEAR or HOD (depending on the level and ‘quality’ of deliberation needed) to elaborate on policy links and provide for adequate input, e.g. for the CIS process, thus checking our contribution against other relevant policy / implementation processes, i.e. of the WFD.

In contrast, the BSAP of 2007, which is yet to be implemented until 2021, has been structured in a logical and effective manner. We suggest to use the BSAP to guide the revision of the HELCOM working structure.

In our view, the four main fields of work, as arising from the BSAP, can only be effectively tackled by four dedicated working groups on Eutrophication, Hazardous Substances, Maritime Activities/Response and Biodiversity. This would at the same time streamline the existing working structure and avoid overlapping ToR on the one hand and reflect a targeted implementation of the BSAP on the other hand. The groups should have a clear mandate which should be elaborated when there is consensus about the structure.



Such a structure would lead to fewer meetings and therefore would save resources as regards workloads of national experts as well as of the secretariat.

The overarching group GEAR has turned out to be a very useful group and should further act as a managerial/advisory body, facilitating the work of HDD but also with a “hands on”- touch to the work.

The four working groups would – in principle –report directly to HOD. However, in cases where specific issues are covered by the mandate of GEAR (management according to the ecosystem approach, holistic

assessments, coordination of MSFD implementation), GEAR will receive the report from the groups and after discussion/exchange/commenting/further elaboration deliver a product to HOD for decision. (Examples for direct reporting of a group to HoDs are munitions (from RESPONSE) or IMO-application issues (from MARITIME)).

The four main groups would be responsible for the “technical”/scientific work.

We also suggest that the major pressure issues Agriculture and Fisheries are covered by high level policy platforms (PP) AGRI and FISH. We suggest these not to be additional groups but rather reserving ½ or 1 day of each HOD meeting to discuss political implications and strategies regarding these two issues. The technical/scientific work on these issues would remain within the respective working groups (Eutrophication and Biodiversity). This would allow the setting of a political focus on the main pressures in the Baltic Sea and at the same time align the working structure to BSAP requirements.

MSP work should be placed within the biodiversity group, as originally in the BSAP.