

Joint HELCOM/OSPAR Task Group on Ballast Water Management Convention Exemptions
Sixth Meeting
Gdansk, Poland, 16-17 September 2015

Document title	Result of the project application on ballast water submitted to the EU Life call 2014
Code	7 – 3
Category	INF
Agenda Item	7 – Any other business
Submission date	10.09.2015
Submitted by	Spain
Reference	

Background

Following Group decision taken during 4th meeting in Copenhagen, HELCOM Secretariat and Spanish representation PUERTOS DEL ESTADO who acted as Project Coordinator submitted a proposal to LIFE program.

Main objective of proposal was to get funding to eventually consolidate HELCOM-OSPAR harmonized protocol to survey EU ports. Also proposal included drafting of guidelines for ballast water management and for port state inspections; additionally proposal addressed “plan B” meaning situations where ships could be forced to deliver ballast waters to specialised collecting facilities including properly equipped barges or on-berth fix or truck cisterns for taking the ballast water and/or sediments.

By letter on 07.05.2015 COM rejected proposal on the basis of a very strict evaluation.¹ Appraisal included identification of some non-substantial deficiencies together with other more in-depth deficiencies perceived by Coordinator difficult to overcome. The last ones could be summarized as follows,

- Concrete actions (those included in package C) not perceived as such. They may not fit in LIFE program as they do not really include prevention of IAS introduction, no early warning and rapid response, no eradication and control of established species. Also all actions taken globally are seen as rather ambitious.
- Absence of ship-owners in the partnership estimated as critical for success
- Value of results not considered merit for budgeted money

Although a new proposal can be improved with the commitment of the support of a more solid organizational structure and its correspondent budget, a better description of all sites to be surveyed in more detail, and a much extended elaboration of the training and dissemination plan, there is still a need to reflect on the –at least three- more substantial issues and the changes to appropriately re-orientate any further effort.

This document contains the following Annexes:

1. Copy of the rejection letter by COM
2. Information on the project proposal (presentation)
 - ~ packages and activities
 - ~ locations for port surveys
 - ~ partnership and estimated budget

¹ Minimum pass score set at 55 whereas total score received amounted 47.

Action required

The Meeting is invited to discuss the opportunity to submit a new proposal for the call LIFE which is now open until the 7th October. The Meeting is also invited to consider the option of applying to other EU financial programs such as regional funds (i.e. INTERREG).

In case that the Meeting decides to apply for funding and submit a new project, the Meeting should discuss on the main three following points,

Scope

- Discuss on whether the project should focus on realization of port surveys only. This would imply no guidelines will be elaborated neither on ballast water management by ship operators and crew members, nor on the Port State Control inspection duties.
- Discuss whether the more strategic issue being the alternative to ballast water treatment on board should be addressed by the project, or whether it is preferable that collection of ballast water in port and further treatment on land must be put a part of the project.
- In addition, the Meeting should address the possibility to include remediation actions to fight against already established NIS. Please note this aspect seems to be relevant/critical within LIFE selection criteria.
- Finally, an in-depth discussion is needed to clarify on the scientific and technical aspect of the IAS. More specifically, discussion should focus on whether alternative methods such as DNA must be included in the project as they can assist in the interchange of information previous of species identification. Also extend and practical work related to species DB maintenance and operation must be covered by discussions.

Partnership

- The Meeting should discuss on whether shipping industry together with port organizations must be part of the partnership as a mean to add guarantee for project success in properly assessing state of the art ballast water management at present and real change for a change of behavior in the future
- The Meeting should take into account the possibility to extend project scope to other EU ports in the Mediterranean Sea to better reflect the overall EU picture and raise impact criterion score

Budget

- The Meeting should consider a more clear involvement of members of Joint HELCOM/OSPAR Task Group on Ballast Water Management Convention Exemptions so that budget can be balanced between personal and external cost.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL ENVIRONMENT
Directorate E – Global & Regional Challenges, LIFE
ENV.E.3 - LIFE Nature
Head of Unit

Brussels, 07.05.2015
ENV/E-3 Ares(2015) 3794110

Mr Julio DE LA CUEVA
Puertos del Estado
Av. del Partenón 10
28042 Madrid
Spain

Subject: Proposal LIFE14 NAT/ES/000317
"Tackling invasive alien species introduced by maritime navigation through discharge of ballast waters"

I regret to inform you that your application was excluded from further evaluation due to the insufficient score that it received for at least one of the award criteria 1, 2, 3, 5 or 6. Please find attached the award evaluation of your proposal.

I thank you for your interest in LIFE and look forward to an application from you in a future selection round.

Yours sincerely,

Angelo SALSI

Annex: Award Phase evaluation for your LIFE 2014 application

Annex

Proposal number: LIFE14 NAT/ES/000317

Title: Tackling invasive alien species introduced by maritime navigation through discharge of ballast waters

1. Technical coherence and quality

Minimum pass score: 10

Score received: 8

Positive Comments:

The pre-operational context is only broadly described and in general the budget is well justified. The project will develop Best Practice Guidelines, an Inspection Protocol and a Contingency Action Plan.

The project will seek to minimise the risk of the transfer of Invasive Alien Species (IAS) via ships ballast water and sediment, by means of giving advice and information on ballast water treatment and management to ship owners, best practice in water sampling for Port State Control authorities, and, the development of a ballast water decision support system. It is to develop a Joint Harmonised Procedure (JHP) based on a HELCOM/OSPAR methodology. The need for this project is driven by the Ballast Water Management Convention (BWMC) of the International Maritime Organisation (IMO). N. B. This convention has been recently adopted by IMO and will enter into force in 2015.

The partnership is appropriate for the project and would provide the necessary technical skills as the partners have previous experience with LIFE projects and with the Joint HELCOM/OSPAR Task Group on Ballast Water Management Convention Exemptions.

Negative Comments:

In many cases the proposal assumes prior knowledge, of the problems associated with ballast water discharge, by the reader, which leads to many of the following negative comments.

The sites targeted are not described. The description of the targeted conservation problem lacks any quantified information on the impact on the ecosystems, the maps provided do not show the location of each action and the description of the actions do not clearly identify the ports where they will be implemented. Furthermore, the issue of data and information collection from ships and ports are vaguely described and the proposal fails to properly consider the differing nature and format of the data.

The methodology of the preparatory actions is poorly described. For instance, in Action A.1 it is unclear how the data-base will be created and how the information will be collected; Action A.2 fails to describe how the existing methodologies of sampling will be reviewed; the number of questionnaires in Action A.3 is missing; and how the need of ballast water treatment facilities will be promoted and solved is insufficiently described in Action A.4.

The proposal also fails to describe how the concrete actions proposed will be implemented. In particular Action C.1 (Best practice guidelines) fails to explain the strategy foreseen for the development of the guidelines from the results of the questionnaires and how they will be disseminated; it is unclear how the inspection protocol presented in Action C.2 will be implemented or formally adopted; Action C.3 foresees a “Survey on ports and description of ports” but the information on how the data on ports will be collected and what parameters will be surveyed is missing. Action C.4 (to update the HELCOM-OSPAR risk assessment tool) is not clear, and how such a tool will be disseminated and why it is necessary to solve the target problem is not sufficiently explained.

In general the action outcomes are not well quantified.

The continuation of the project is not guaranteed as the potential financial resources are not identified and the statement by private shipping companies, claiming that they will ensure the long term viability of the project through a change in their current practices, is not convincing, since the actions proposed are not sufficient to ensure a change of behaviour and there is no formal commitment to adopt the documents that will be developed.

The management of the project is poorly planned. No description of how the coordination between so many partners will be ensured is provided, the number of meetings is not specified and a full time project manager is not foreseen (only one person for 180 days is allocated to Action F.1). Moreover, an organigram is not provided.

Although the timetable for the project is generally appropriate, Actions A.1, A.3 and A.4 are very ambitious and insufficient time has been allocated for their implementation. In addition, the timing for the submission of deliverables associated with Actions A.1, A.2 and A.3 is rather ambitious taking into account their magnitude and complexity.

Some of the potential difficulties faced by the project are wrongly assessed, and insufficient preparation has been undertaken to minimise their effect. For example, the risk of a lack of participation by ship-owners and captains is not sufficiently considered; while according to the proposal the ecological status of the ports may be an issue that could interfere with the success of the project, but this potential problem is not properly addressed.

The project is potentially very interesting as it will tackle a severe threat for marine environment, however the information given on the pre-operational situation, the actions description and the lack of clear and operational expected results make the project not sufficient value for money.

2. Financial coherence and quality

Minimum pass score: 10

Score received: 11

Positive Comments:

All the beneficiaries provide an adequate financial contribution to the project.

The requested EU co-financing does not exceed 60%

The personnel costs are appropriate

The external assistance costs do not exceed 35% of the total budget.

Overhead costs (€ 2,786) are very low, especially considering the number of beneficiaries (19).

Negative Comments:

Form A4 from the private company Ecológica Ibérica y Mediterránea, S.A, is unreadable; therefore it is impossible to confirm whether the budget is balanced.

The insufficient level of technical description of the actions, i.e. what and how actions are to be implemented, does not allow a proper evaluation of the budget proposed.

3. EU added value: extent and quality of the contribution to the specific objectives of the priority areas of the LIFE sub-programme for Environment

Minimum pass score: 10

Score received: 15

Positive Comments:

The expected conservation benefit would be to minimise the introduction of marine IAS and thus protect the action areas against possible ecological disturbance by harmful alien species. Examples of such ecological disturbance are the displacement of native species, by competition for space, light or food, upsetting predator/prey relationships, and in some cases IAS can have a toxic effect of indigenous species. Minimising these risks will have a conservation benefit, but this must be seen in the context of the ecological state of some of the port areas, which can be poor.

The targeted threat (invasive species introduced through ballast water) is of European importance. Indeed, the introductions of alien species into new environments by ships' ballast water, as well as by other means e.g. via individuals attached to ships' hulls, is identified as one of the four greatest threats to the world's oceans and to biodiversity globally (GloBallast. 2002. Global Ballast Water Management Programme. <http://globallast.imo.org>. This source refers to invasive marine species). In addition, the EU relevance of the proposal is further strengthened by its wide geographical scope since the project is expected to be implemented in 30 Ports of 11 European nations (Denmark, Estonia, Finland, France, Germany, Lithuania, Netherlands, Poland, Spain, Sweden, and the United Kingdom).

Most of the sites are described as project protected sites mainly used for navigation, both commercial and recreational and are influenced by the activities of local shipping and ports. The selected sites are Baie de Seine orientale - FR 2502021; Littoral augron – FR2512001 and FR5200621; Westerschelde & Saeftinghe - NL9803061; Vlakte van de Raan- NL2008003, and Sebadales de Guasimeta – ES70100021.

The proposal falls within the Convention for the Control and Management of Ships' Ballast Water and Sediments (BWMC) and has the potential to contribute to the implementation of MSFD and WFD, and to any EU policy on ballast water management. The proposal would also contribute to the implementation of the Joint HELCOM-OSPAR Harmonized Procedure on Exemptions under the Ballast Water Management Convention (JHP), adopted in 2013 by the European Commission.

Negative Comments:

In addition to the proposed sites, the actions will be also implemented in port areas in 11 EU countries, but only a general map of Europe is presented. Consequently the majority of the port sites are only vaguely defined and there is no evidence of the proposal securing appropriate conservation status for them.

However the project targets an important threat for marine environment and we appreciate the effort made to create a so wide partnership:

- Attachment 3 mentions that a quality test of ballast water should be carried out; however there is no evidence of it in the description of the actions
- The impact at the targeted sites is not quantified and will not be quantified during the project
- Actions are not sufficiently described,
- No concrete results are expected and quantified. The number of trained captains is low (240) compared to the ship traffic (which is not sufficiently described in the A forms) in the 30 Ports addressed.

4. Contribution to project topics

No minimum pass score

Score received: 0

Positive Comments:

The proposed Biodiversity action targets potential marine Invasive Alien Species (IAS), under Target 5 of the Biodiversity Strategy.

Negative Comments:

How the proposal fits within the LIFE programme is not clearly demonstrated.

Projects targeting IAS need specific actions or approaches to prevent the introduction of IAS, act as an early warning and rapid response to an IAS, and target eradication or control of established species. Although the proposal addresses these concerns in general term, and it is clear that it will help to minimise the impact of ship borne IAS, it is not always clear how the proposed risk system will be used for early warning and rapid response and in the eradication or control of established species.

No concrete results are apparent from project implementation, or they are confusingly or insufficiently presented, therefore the project cannot truly be considered to fit Target 5 by contributing to halting the loss of biodiversity and contributing to the restoration of marine habitats.

5. EU added value: multipurpose, synergies, and integration

Minimum pass score: 7

Score received: 8

Positive Comments:

The project addresses the Marine strategy Framework Directive as it focuses directly and indirectly on descriptor 2, non-indigenous species, and indirectly on WFD achievement of “good ecological status”

The port survey methodology is the main result of “HELCOM ALIENS 3 project” which itself was a follow-up of the “HELCOM ALIENS 2 project” financed by special contributions of Finland and Sweden and by in kind contributions of the HELCOM Secretariat. The work developed to elaborate the port survey methodology was used in several port surveys that took place in the Baltic Sea during 2012 and 2013.

Negative Comments:

The proposal is focussed on the development of HELCOM protocols and as such it cannot be confirmed that there is a clear uptake of results from framework programmes, other than this being implicit in the HELCOM work.

6. EU added value: replicability and transferability

Minimum pass score: 5

Score received: 5

Positive Comments:

The project has the potential to be replicated in all the EU port areas provided that the project is successful in harmonising the data and the information from many different sources.

The dissemination of the results through organisations such as ECSA and ESPO will strengthen networking and enhance the dissemination potential of the project.

A training course to disseminate the methodologies identified will be held four times in each of the following four countries, Poland (University of Gdansk), Sweden (the Chalmers University of Technology), Lithuania (Klaipeda University) and Estonia (University of Tartu).

Negative Comments:

The monitoring actions proposed are poorly planned and described. For example, the sole monitoring Action D.1 is expected to monitor the change in the behaviour of the stakeholders involved, however the proposal fails to explain what and how parameters

will be measured, and which and how many stakeholders will be involved. In fact the proposal fails to include surveys in order to monitor the impact of the actions proposed on the IAS; and the monitoring of the outcomes and impacts of the multi annual work programme is very basic.

Dissemination activities are insufficiently detailed and are mainly focused on the implementation of the obligatory communication and dissemination means, therefore they are not deemed sufficiently ambitious in scope and targets. Action E.3 (Educational proposal) and Action E.4 (dissemination of the JHP- Joint HELCOM/OSPAR Harmonized Procedure) are poorly described, what will be implemented is unclear, and the target audience is neither specified nor quantified.

7. EU added value: transnational, green procurement, uptake

No minimum pass score

Score received: 3

Positive Comments:

The proposal involves trans-national cooperation and/or international scope as it would take a multi-country approach, including direct implementation actions in Denmark, Estonia, Finland, France, Germany, Lithuania, Netherlands, Poland, Spain, Sweden and the United Kingdom.

Negative Comments:

The project does not consider applying green public procurement in the implementation of any of the foreseen actions.

The proposal does not foresee taking up results of environmental and climate-related research and innovation projects financed by Horizon 2020 or by preceding Framework Programmes.

8. Overall phase minimum score (total of scores for criteria 1,2,3,5 and 6)

Minimum pass score: 55

Score received: 47

9. Total score received: 50



GOBIERNO
DE ESPAÑA

MINISTERIO
DE FOMENTO

Joint HELCOM/OSPAR Task Group on Ballast Water
Management Convention Exemptions
Sixth Meeting

Julio DE LA CUEVA – Puertos del Estado

Gdansk, Poland, 16-17 September 2015

Locations for port surveys

- Rotterdam
- Paris
- Rouan
- Le Havre
- Vilag^a Aurosa
- Marín
- Vigo
- Arrecife
- Pto Rosario
- Arinaga



- Esbjerg
- Frederikshav
- Grenå
- Helsingør
- Rødby
- Rønne
- Gdańsk
- Szczecin
- Swinoujście

Member State code	Beneficiary short name	Total costs of actions in € (including overheads)
-------------------	------------------------	--

Coordinating beneficiary's contribution

ES	PdE	269.880
----	-----	---------

Associated beneficiaries contributions

DE	BSH	25.900
ES	FVP	78.950
FI	HELCOM	92.293
UK	OSPAR	33.280
DK	PA.Danish	113.640
PL	PA.Gdansk	150.260
FR	PA.Le Havre	154.320
ES	PA.Palmas	162.440
NL	PA.Rott	105.600
ES	PA.Vigo	150.260
SE	STA	17.780
FI	SYKE	50.260
SE	U.CHALMERS	22.652
PL	U.GDANSK	50.160
LT	U.KLAIPEDA	58.380
EE	U.TARTU	42.586
NL	co DAMEN	46.200
ES	co ECOIMSA	46.200

1.671.041