



Document title	Comments to the outcomes of working groups' meetings
Code	3-18
Category	CMNT
Agenda Item	3 - Matters arising from the HELCOM Groups
Submission date	5.12.2017
Submitted by	Coalition Clean Baltic
Reference	document 3-14 HOD 53-2017

Background

CCB forwards the following comments with regards to outcomes of the working groups' meetings

MARITIME 17-2017

- CCB welcomes that the problem of fertilizer cargo handling and potential associated nutrient losses was addressed by the MARITIME Group and that collection of relevant national information will be channeled via HELCOM Secretariat, however regrets that the process of collecting such national information is again delayed and hence outcome of this work cannot be made available before the Ministerial Meeting to take necessary management action at policy level.

FISH 7-2017

Salmon

- Finally there seems to be a progress towards finalizing a salmon management plan. Recently presented draft positions in BALTFISH underlines and even relies on HELCOM to conclude on a number of issues such as recreational fishing, estuary and upstream efforts as well as addressing rearing and releasing practices. However the plan drafted in discussed in BALTFISH also has several flaws and is disconnected to salmon measures and targets already agreed within HELCOM. The target level of 80% potential smolt production is not adhered to and very surprisingly, the listing of wild Baltic salmon rivers that is presented now is neither in line with ICES data nor the HELCOM SALAR. This is unacceptable and Contracting Parties must make sure to connect with counterparts nationally to sort this out. It is impossible to have a 2-way system where basic facts and starting points are not the same.

Eel

- The status of the eel has since BSAP was agreed and since last HELCOM Ministerial Meeting continued to deteriorate and the sense of urgency cannot be overstated. The latest ICES advice from November 2017 show a further decline in incoming juvenile eel, glass eels. The level is now down to 1,6% of the baseline. HELCOM must underline this unacceptable development. HELCOM must continue to address eel with stronger commitment to now really act and support national and upstream efforts, linking efforts across the Baltic and internationally. Coordinated efforts such as migration period closures throughout the Baltic and evaluating if restocking really increase silver eel escapement must take place. The use of public funding must improve and results of past 10 years efforts are far from flattering. As one example, public funds are still used for restocking upstream dams that cause high mortality on eels and the stocking is partly designed for upholding the fishery and not recovery of the stock.

Aquaculture

- The ambition to increase aquaculture while reducing direct and indirect impacts to the environment is a challenge. CCB is finalizing a short study of national aquaculture strategies, considering what public money is being spent on in light of that challenge, expressed both within EU and in HELCOM recommendation. The lack of environmental goals and targets is almost universal and this is noteworthy considering the rules of the EMFF and CFP in supporting sustainable aquaculture. "Growth" is the only goal but without hardly a word on how to spend public money to meet the above challenge. CCB will present this report at a later stage to HELCOM.

- To develop and agree on a joint concept for BAT would be a step forward and helpful for contracting parties when focusing support in the form of public money and issuing permits. Unwise operations and illegal activities such as farming alien species without proper permits must be acted upon. A rogue farm operation in Denmark has done exactly this and acted without permits and the authorities knowledge in farming Coho salmon, a Pacific species (*Oncorhynchus kisutch*). Such examples must be forcefully acted upon and severely fined.

Cod

- The Baltic nations are again at the cross roads regarding cod, and it is now time to consider why fishing for cods around 35cm for extremely low profit and prices continues. The importance of cod in the ecosystem outweighs the gains and the importance should lie with sustaining the stock for the benefit of the ecosystem. Being truthful to the principles of ecosystem based management stipulates not only a wider consideration of stock interactions such as making sure cods have sufficient amount of pray and habitats. If the current trend continues cod will soon be considered a conservation and not a fishery issue.

STATE & CONSERVATION 7-2017

- CCB re-iterates its serious concerns with the state-of-play of the Draft recommendation on biotopes, habitats and biotope complexes, that is put on hold by study reservations of one Contracting Party.
- CCB also feels that the plans by Finland to do grey seal monitoring every other year instead of every year will disrupt the time series and the cooperation with other nations involved in the sensuses
- CCB regrets the delayed compilation of the document on HELCOM data needs to assess incidental by-catches and fisheries impact on benthic biotopes, as it seriously slows down assessment of respective MSFD criteria.

PRESSURE 7-2017 / WS RAP ML 2-2017

- CCB regrets that HELCOM PRESSURE as well as marine litter experts failed to see the need to address stormwater management as one of the 'low-hanging' fruits to be addressed in implementation of the RAP ML, even though it constitutes several joint actions of the Plan (RL4, RL7) and further actions are called for from various actors. Justification of this decision by lacking scientific evidence is beyond our understanding, as numerous research, scientific and applied [studies](#) have been carried out recently to prove that efficient stormwater management may help to reduce significantly inputs of th microplastic. Likewise, CCB is concerned with the discussion that existing municipal waste water treatment sector can sufficiently trap microplastic, which can be the case only for modern, advanced, large-scale facilities.
- In addition, CCB draws the attention of Contracting Parties to the needs of addressing traditional waste management streams, especially in the coastal area. This call for action was based on publicly available information that in June 2017 a dumpsite (storage facility) for plastic material in the vicinity of Jurmala, Latvia (in close vicinity of the Gulf of Riga), got on fire. According to numerous reports, the amount of stored plastic material accounted up to 14,000-20,000 t and about 40% of this material was burnt by the fire. Reportedly, the dumpsite also contained mixed waste, including hazardous. The investigation carried out afterwards by the authorities, revealed that this storage was illegal and it originated from a material being shipped to Latvia for recycling/re-processing from Skandinavia. The case is currently under criminal investigation by law enforcement authorities

PRESSURE 7-2017 / AGRI 5-2017

- CCB strongly supports EU and Germany that proposed Nutrient Recycling Strategy should be focused on recycling of nutrients upstream but not on end of pipe solutions (especially large-scale technical measures to remove nutrients from the Baltic Sea)
- CCB regrets that the offer to arrange expert workshops adressing relevant agri-environmental matters back-to-back with HELCOM AGRI meetings and thus enhancing stakeholder dialogue with the sector was not supported by the AGRI Group.

Action requested

The Meeting is invited to take note of the comments and use those as appropriate when discussing the outcome of working groups' meetings and their plans of work for the upcoming period.