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<b>Document title</b>	Proposal for an alternative structure for further work on the BSAP updating
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<b>Category</b>	CMNT
<b>Agenda Item</b>	3 - Update of the Baltic Sea Action Plan
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Document 3-3 of HELCOM HOD 55 presents an adjustment to BSAP structure developed by GEAR 10-2018. It is explained to maintain the four original segments and goals but to expand on the topics covered by the segments.

Having scrutinized the document, we felt that the proposed structure was not clear. It was not possible to understand how ecological objectives would relate to the system, segments called Eutrophication and Pollution were in our view overlapping and similarly there would be impacts from “Maritime” that could be linked to both “Eutrophication” and “Pollution”. Biodiversity on the other hand, we think is the ultimate heart of the ecosystem that receives all the impacts from human activities and hence it should rather be addressed by a cluster of ecological objectives than by making it into an action segment. Furthermore, we were missing the ecosystem approach to management of human activities which implies that only human activities can be managed and acted upon, not biodiversity or the ecosystem as such. Therefore, we would like to propose a new structure which would make more clear the linkages between the objectives and human activities impacting them. We think that such a matrix approach could help us to move further with next steps of planning.

We present the proposed structure in the matrix below. HELCOM vision of a clean and healthy Baltic Sea would be embraced by Objectives for Ecosystem Health Status (i.e., we propose changing the wording from Ecological Objectives to Ecosystem Health (status) Objectives which would encompass biodiversity, non-indigenous species, water quality, contamination, marine litter and noise and possible other corresponding items). They would be presented on the left hand side of the matrix and they could be further defined by core indicators and thresholds. In our view, biodiversity should receive a prominent role and that would mean that it should be treated by separate species groups and habitat entities. The main part of the matrix would be used to cluster manageable human activities under the titles Land-based sources, Maritime sources (which could be alternatively named Sea-based sources) and Preservation activities. The first two of these would include activities that cause pressures (e.g. nutrient inputs, extraction of species) that impact the ecosystem and can be managed to reduce the pressures and the third theme includes activities that are aimed to enhance the status of the ecosystem (here called preservation activities).

An important factor is that in such a matrix structure it is possible to work by scrutinizing which activities cause pressures and impacts on which Ecosystem Health Objectives and identify measures to reduce those pressures.

Hence, our proposal is that HELCOM would use the matrix to structure the next steps of BSAP updating work to proceed in the following order:

1. Identify the main themes of Ecosystem Health Objectives and start working on defining them. The existing Ecosystem Objectives can be mapped to the new ones taken up as such or modified to fit the new approach.
2. Next, it ought to be identified which pressures impact each of the objectives and from which sectors the pressures originate. For the sake of clarity pressures have been left out from the current matrix.
3. Identify and place the pressure-causing sectors under each of the three main Action Segments: Land-based sources, Maritime/Sea-based sources and Preservation activities.
4. Identify which sectors cause pressures that impact Ecosystem Objectives by utilizing the matrix i.e. in the matrix below they have been preliminarily identified by green color cells.
5. Identify actions and measures as presented by numbers in the colored cells below and further explanatory text for the numbers below the matrix.

		Land-based sources to be managed					Maritime sources to be managed (alternatively Sea-based)					Preservation activities				
		Agriculture and forestry	Industries	Urban sources, WWTs	Scattered dwellings	Etc.	Shipping	Fisheries and aquaculture	Construction	Dredging	Extraction of minerals	Etc.	Conservation	Restoration	Restocking	
<b>Ecosystem Health Objectives</b>	<b>Eutrophication</b>	1.1														
	<b>Hazardous substances</b>															
	<b>Non-indigenous spp.</b>															
	<b>Marine litter</b>															
	<b>Underwater noise</b>															
	<b>Biodiversity</b>	Mammals						7.6								
		Birds														
		Fish														
		Benthic habitats														
		Pelagic habitats														

## Action requested

The Meeting is invited to

- consider the proposal and agree to use the matrix approach as the basis for further work and agree on the structure of BSAP for further work as found suitable.