



Document title	Guidance for drafting the updated BSAP in 2021
Code	5-10
Category	CMNT
Agenda Item	5 – Update of the Baltic Sea Action Plan
Submission date	30.11.2020
Submitted by	Executive Secretary
Reference	HOD 59-2020 document 5-8

Background

The first full draft of the updated BSAP has been submitted to this Meeting ([document 5-8](#)). The drafting has been guided by the [detailed plan for drafting](#) and the work has been organized based on the agreed preliminary timetable and work plan for drafting the updated BSAP (Annexes 2 and 3 to the [Outcome of HOD 58-2020](#)). In the course of the drafting in autumn 2020, there have been requests to provide more detailed guidance and specify further the timetable in spring 2021.

The attached document highlights specific questions and topics where the need for additional guidance has been highlighted. It is intended to facilitate the discussion and developing a shared view on guidance for further drafting under document 5-8. The guidance will then be shared with the DG BSAP and DG BSAP segment teams. The document also included a preliminary timetable for spring 2020.

Action requested

The Meeting is invited to take note of the information and use it as appropriate when considering document 5-8.

Guidance for drafting the BSAP in 2021

Overarching preamble and introduction

As agreed by HOD 58-2020, the first version of the overarching preamble for the updated BSAP has been drafted by DG BSAP and reviewed by the GEAR group. In addition to the overarching preamble, the BSAP will start with an introduction explaining, e.g. the structure and function of the BSAP. The first version of the introduction and the accompanying visualization has been drafted by the Secretariat.

The following guidance is included in the detailed plan for drafting agreed by HOD 58-2020:

Length: Maximum 5-10 pages

The preamble of the BSAP will address issues that cut across the segments. The preamble should include overarching principles and higher-level aims from the Helsinki Convention, UN SDGs and other relevant policies, for example:

- Implementation based on ecosystem approach;
- Reaching good environmental status;
- Be based on the precautionary principle;
- Sustainable consumption and production;
- Clean and environmentally sound technologies;
- Sustainable use of natural resources;
- Integration of climate change into policies.

Climate change will be addressed as a key component of the preamble.

The preamble should also include a section explaining the rationale behind and showing the structure and function of the BSAP (e.g. what is a goal, what is an ecological objective, what is a management objective, how do they fit together, what is the rationale behind the segment division and how do the respective segments support each other, how could climate change influence them...).

There could also possibly be a timeline overview of the planned implementation of BSAP measures and actions based on the target years provided in the operative sections. For those with no specified target year, the end year of the BSAP would function as target year.

The following comments relating to this section were expressed in Meetings in Autumn 2020 and remain open:

- The overarching preamble could also include a paragraph on climate change mitigation and on recognizing the socio-economic benefits of implementing the measures and actions included in the updated BSAP (GEAR 23-2020, DG BSAP 4-2020);
- Additional strategic statements might be included in the overarching preamble when there is more information on the actions that will be included in the updated BSAP to ensure the linkage between the preamble and the operative sections (DG BSAP 4-2020);
- The implementation and follow-up of the updated BSAP could be addressed as part of the introduction. (DG BSAP 3-2020). This could include brief explanation of the annexes, the HELCOM Explorer, some agreed timing of reporting (e.g. 2025 and 2030) and the link to status assessment and some overview of foreseen status assessments taking place under the updated BSAP (HOLAS, PLC, RedList, MPA coherence etc).

Questions for providing guidance:

- Should the preamble include a paragraph on climate change mitigation and on recognizing the socio-economic benefits of implementing the measures and actions?
- Is the content of the introduction fit for purpose, and if not, what is missing/needs to be changed?
- Is the planned content to explain the follow-up of the BSAP suitable, and if not, what else should be considered? Should information on the number and timing of reporting intervals for follow-up be included? If so, what should these be (e.g. 2025 and 2030 or 2023, 2025, 2027 and 2030)?

Segment introductions

Biodiversity, eutrophication, hazardous substances and litter, and sea-based activities

HOD 57-2019 requested the Secretariat to prepare a first draft of the introductory text for the BSAP segments on biodiversity, eutrophication, hazardous substances and litter, and sea-based activities. The first drafts of the segment introductions were reviewed by HELCOM Working Groups and DG BSAP segment teams in autumn 2020. However, not all proposed changes by the Working Groups or DG BSAP segment teams have yet been incorporated into the text.

The following guidance for the segment specific introductions (eutrophication, hazardous substances and litter, sea-based activities, biodiversity) is included in the detailed plan for drafting agreed by HOD 58-2020:

Length: Maximum 2 pages

The updated BSAP will have a layered preamble which will also include segment-specific introductory text. Such text could focus on aspirations and strategic decision for the respective segment and also recall HELCOM recommendations and other relevant commitments associated to the respective segment. The aspiration to implement international conventions could also be part of the segment preamble.

The beginning of each segment will include in the same way and order:

- Visualization of goal, ecological objectives and management objectives for segment;
- Visualization of pressures and activities addressed by segment actions and measures (see proposals in Annex 1);
- Link of segment to relevant climate change parameters and, if possible, key messages;
- Action areas;
- Link to relevant SDG;
- Include cross-references with other segments.

The following comments relating to this section were expressed in Meetings in Autumn 2020 and remain open:

- The structure of the segment introductions should be more or less the same across all segments (GEAR 23-2020, DG BSAP 4-2020), e.g. by using the same headings under each segment (GEAR 23-2020);
- The introductions could be shortened by removing background information so that the focus would be on the actions (GEAR 23-2020, DG BSAP 4-2020);

- There is a need for stricter guidance to align the texts, e.g. the texts under the sub-heading “action areas” are not cohesive across segments and this part could perhaps be structured along with the management objectives (GEAR 23-2020, DG BSAP 4-2020);
- The text could contain strategic statements (GEAR 23-2020, DG BSAP 4-2020);
- It should be considered if there is a need to reflect the information intended for the visualization also in the text (e.g. climate change parameters and links to SDG goals and targets) (GEAR 23-2020);
- In addition to including a text box to visualise the objectives, there could also be info boxes explaining terminology such as MAI and NIC (DG BSAP EUTRO 2-2020);
- Some Contracting Parties were of the opinion that the introductions could be half a page long with references to existing documents such as the State of the Baltic Sea report, while others were of the view that the texts should be able to function as stand-alone documents without too many references and thus would need to be longer to provide context (although preferably within the recommended page limitations). It was also suggested that the length of the introductions could vary between segments (DG BSAP 4-2020);
- A statement calling for the implementation of HELCOM Recommendations should be included in the introductory parts of the BSAP (DG BSAP 4-2020).

Questions for providing guidance:

- How much background information, and of what type, should the segment introductions contain? Should we assume that the reader is already familiar with the topic or should there be some background information to provide context for less initiated readers?
- Could all the topics listed in the guidance as bullet points (*The beginning of each segment should include...*) only be included as a text box or visualization to shorten the text? Could there be other text boxes to explain terminology, e.g. MAI and NIC, or even a glossary of terms?
- Should all the segment introductions have the same sub-headings? If yes, what should the headings represent?
- Can the length of the introductions vary across segments? Should 2 pages including visualizations still be the maximum length?
- Should there be more focus on strategic statements and if so, of what type and how should they be developed (see also comment to operative section)?

Horizontal actions

HOD 58-2020 supported the inclusion of an additional segment focusing on horizontal actions in the updated BSAP, to be divided by subheadings representing the various identified horizontal topics (climate change, monitoring, MSP, Economic and social analysis, and financing) and invited the DG BSAP to develop a proposed structure for the segment. DG BSAP 3-2020 made a proposal for the structure and invited the Secretariat, in cooperation with the relevant HELCOM groups, to draft the introductory texts for topics of the horizontal actions segment. HOD 58A-2020 agreed in general on the proposed outline for the financing section that is a part of the horizontal actions segment, and invited Finland and Sweden, with the help of the Secretariat, to submit the first draft of the financing section to HOD 59-2020.

DG BSAP 4-2020 invited the Secretariat to organize a written procedure to comment on the horizontal actions segment after HOD 59-2020.

The following structure for the horizontal actions segment was agreed by DG BSAP 3-2020 and following outline for the financing part was agreed by HOD 58A-2020:

Overall structure of the horizontal actions segment

- segment preamble (short introduction)
- Climate change
 - o introduction
 - o actions
- Monitoring
 - o introduction
 - o actions
- MSP
 - o introduction
 - o actions
- Economic and social analyses
 - o introduction
 - o actions
- Financing
 - o Introductory parts
 - Economic benefits of protecting the Baltic Sea (from the work of the ESA network)
 - Costs of protecting the Baltic Sea (from the work of the ESA network)
 - Cost-effectiveness of measures to be included in the updated BSAP (possibly from the work of the ESA network)
 - Explanation of Contracting Parties' responsibility for the implementation of the updated Baltic Sea Action Plan taking into account the role different stakeholder groups also have.
 - o Existing sources of external funding for the implementation
 - As in the current BSAP, explanation about and possibly a list of existing sources available for the Contracting Parties and stakeholders for implementation.
 - Private investors' and contributors' possible role in supporting or taking part in the implementation
 - o Commitments
 - [E.g., commitment by the Contracting Parties to fund implementation of the updated BSAP.]
 - [E.g. commitment to set up a Fund (on the basis of BSAP Fund) and contribute to it]
- Annex with supplementary information on the actions

The following comments relating to this section were expressed in Meetings in Autumn 2020 and remain open:

- Hot spots could be a topic under the horizontal actions segment (DG BSAP 4-2020);
- "Horizontal actions" might not be self-explanatory to the reader and should be better defined or that the name of the segment might be changed (DG BSAP 4-2020);
- The introductions could be shortened (DG BSAP 4-2020).

Questions for providing guidance:

- Are all relevant topics included under the horizontal actions segment or should additional topics such as hot spots be added?
- Is the name of the horizontal actions segment sufficiently explanatory or should it be changed, alternatively better defined in the introduction?
- Are the introductions of appropriate length and content?

Operative sections

The operative sections of the four segments (eutrophication, hazardous substances and litter, sea-based activities, biodiversity) will start with the description of the current state and the desired state. These texts have been drafted by the Secretariat and reviewed by the Working Groups and DG BSAP segment teams. The actions that follow include both existing actions that have not yet been implemented and new actions. HOD 58-2020 agreed in principle on the existing actions that will be transferred to the updated BSAP and HOD 59-2020 will consider the proposals for new actions.

The following guidance is included in the detailed plan for drafting agreed by HOD 58-2020:

Operative sections, including the agreed actions, will be presented for each segment and associated goal of the updated BSAP.

With the more strategic and higher-level ambitions being expressed in introductory passages, the operative sections will focus on the plan for action.

Description of current state

Length: Maximum ½ page

Each operative section will be initiated by a brief description of the state of the Baltic Sea based on the latest HELCOM assessments ([Outcome HOD 56-2019, para 2.23](#)).

Description of desired state

Length: Maximum ½ page

This section will contain an elaboration of the HELCOM ecological objectives, representing the desired state of the environment or the acceptable level of pressure.

Actions

Overall, the targets and actions included in the updated BSAP should be practical, realistic, concrete and result-oriented, while maintaining a high level of ambition. In order to increase the effectiveness and efficiency of the actions included in the BSAP these should focus on targeting the sources of the problems, *inter alia*, human activities such as agriculture or fisheries, rather than dealing with the resulting symptoms. The actions to be included in the updated BSAP should also primarily target the main challenges facing the Baltic Sea environment. To ensure reaching the goal of the plan, actions should contain provisions to address new or emerging pressures.

With regard to the formulation of actions, to facilitate the reading and to clearly outline the plan for action the following has been agreed:

- Initiating words (WE AGREE, WE PROMOTE) will not be used in the operative segments;
- More detailed information on actions such as any lengthier descriptions of rationale behind them and potential effects of their implementation is to be provide as supplementary material;
- Actions should be formulated as concrete as possible in terms of aim or output and should specify a target year for implementation;
- Measures that can contribute directly to improving the state of the Baltic Sea will be presented separate from those actions that are aimed at supporting implementation of actions or other HELCOM activities (e.g. actions related to databases, mapping, assessments,

guidelines). However, HOD 57-2019 noted that that it may not always be clear how such a differentiation should be made and that it will be necessary to consider this from case to case.

With this approach the operative sections will include a straightforward plan of actions to be followed up by future reporting, structured according to the objectives and a common outline for each segment.

The following comments relating to this section were expressed in Meetings or via correspondence in Autumn 2020 and remain open:

- The section on description of the current state could be moved from the start of the operative section to the introductory part (GEAR 23-2020, DG BSAP 4-2020);
- The Secretariat could after HOD 59-2020, where needed, prepare proposals for amendments to existing actions and to redraft the provisionally approved new actions based on the comments provided by experts, HELCOM Working Groups and HOD during the review process, as well as merge new proposals with existing actions where overlap has been identified. These amended actions would then be presented for consideration and further work by DG BSAP and the segment teams in spring 2021. The Secretariat could also in this process highlight if any of the actions could be moved to the segment specific introductions as strategic statements (DG BSAP 4-2020).
- Could new proposals for actions still be submitted after HOD in December? (via correspondence)

Questions for providing guidance:

- Is the chapter on the current state placed correctly as the start of the operative section or should it rather be included in the segment introductory background text?
- How should proposals for amendments to approved existing actions and redrafting of the provisionally approved new actions, as well as merging of new proposals with existing actions, where overlap has been identified, be arranged prior to the next segment team meetings?
- Could new proposals for actions, where gaps are identified through the finalization process, still be submitted after HOD in December 2020?

Annexes

Each segment in the updated BSAP will have a corresponding annex, which will contain detailed supplementary information on each action under the segment in question, to guide future assessment of implementation and provide context for the actions. The supplementary information will be provided by the Working Groups that discussed the task in the autumn meetings.

The following guidance is included in the detailed plan for drafting agreed by HOD 58-2020:

In addition to the main BSAP document additional information and guidance for future assessment of implementation can be annexed as supplementary material. Such information could summarize the agreed actions and also include e.g.:

- rationale behind actions;
- tentative information on effect of actions;
- if feasible, indicators to follow-up the implementation of the action.

The last point, to agree on 'indicators' for when an action is to be considered as accomplished would greatly facilitate the future follow-up and reporting but will depend on availability of time. Indicators for when actions are considered accomplished regionally is included in the HELCOM Explorer for the existing actions.

The supplementary material could also be provided in the form of fact sheets if more practicable.

The following comments relating to this section were expressed in Meetings in Autumn 2020 and remain open:

- It would be useful to also include information about expert groups that support the work of the main Working Groups mentioned in the Annex (MARITIME 20-2020, STATE & CONSERVATION 13-2020, PRESSURE 13-2020).
- Information on activities and pressures should be compiled by the Working Groups based on a common list of activities and pressures, but the information should only be included in the HELCOM Explorer and not in the Annex. The Secretariat could prepare a draft list of activities and pressures, possibly utilizing the list compiled for the sufficiency of measures work as a basis, to be reviewed and agreed by WGs by correspondence at the latest in early 2021 (STATE & CONSERVATION 13A-2020).
- The proposed Annexes are too detailed for the updated BSAP and more suitable for the implementation plan. Also, the proposed inclusion of the rationale and potential effect might inspire an extensive discussion. Thus, the table should contain a minimum of the most relevant information (PRESSURE 13-2020).
- The indicators of achievement could be included in the proposed annex only when the actions constituting the updated BSAP are agreed and their implementation is clarified (PRESSURE 13-2020).
- Some actions aimed at promotion and enhancement, which is a continuous process, are difficult to follow-up and to set target years for (AGRI 10-2020).

The annexes are proposed to contain the following supplementary information for the agreed actions:

Theme	Topic	Action	Type of Action	Target year	Rationale	Potential effect	Implemented by WG/EG	National/joint	Indicator for achievement

Questions for providing guidance:

- Does the proposed content of the annexes provide the relevant information to guide future assessment of implementation and provide context for the actions?
- Would having the annexes as a separate supporting document, outlining the plan for implementation of the actions in the BSAP, be more suitable?

Preliminary timetable for spring 2021

The following preliminary timetable for spring 2021 is suggested. The meetings or meeting times in brackets are proposals by the Secretariat that have not yet been agreed by any groups.

Month	BSAP main text		Annexes	
	Meeting/group and time	Task	Meeting/group and time	Task
January	DG BSAP SEA 2-2021, 13 January 2021	Review the introduction for the sea-based activities segment based on guidance from HOD 59-2020 Redraft actions, if needed, based on written comments received after HOD 58-2020 as well as comments by WGs and HOD 59-2020 Consider merging of overlapping actions		
	DG BSAP HZ 2-2021, 19 January 2021	Review the introduction for the hazardous substances and litter segment based on guidance from HOD 59-2020 Redraft actions, if needed, based on written comments received after HOD 58-2020 as well as comments by WGs and HOD 59-2020 Consider merging of overlapping actions		
			STATE&CONSERVATION intersessional meeting, Mid-January 2021	Drafting the Annex with supplementary information for actions under the mandate of S&C
	DG BSAP BIO 2-2021, (January 2021)	Review the introduction for the biodiversity segment based on guidance from HOD 59-2020 Redraft actions, if needed, based on written comments received after HOD 58-2020 as well as comments by WGs and HOD 59-2020 Consider merging of overlapping actions		
	DG BSAP EUTRO 3-2020, January-early February 2021	Review the introduction for the eutrophication segment based on guidance from HOD 59-2020 Redraft actions, if needed, based on written comments received after HOD 58-2020 as well as comments by WGs and HOD 59-2020 Consider merging of overlapping actions		
February	DG BSAP 5-2021, Mid-February 2021	Draft further the overarching preamble and horizontal actions segment based on comments given by DG BSAP 4-2020 and guidance by HOD 59-2020 Review the next versions of the segment specific introductions and actions as drafted by the segment teams		

Month	BSAP main text		Annexes	
	Meeting/group and time	Task	Meeting/group and time	Task
			MARITIME intersessional meeting, Late February or early April	Drafting the Annex with supplementary information for actions under the mandate of MARITIME
			FISH intersessional meeting, February or March 2021	Drafting the Annex with supplementary information for actions under the mandate of FISH
March	HELCOM 42-2021, 17-18 March 2021	Review and give further guidance for drafting the overarching preamble and segment introductions Agree on actions as far as possible and give guidance for further drafting the actions, if needed		
	(DG BSAP segment teams, Late March)	Review the segment introductions and actions based on guidance from HELCOM 42-2020		
			RESPONSE intersessional meeting, 25-26 March 2021 (tbc)	Drafting the Annex with supplementary information for actions under the mandate of RESPONSE
April	(DG BSAP, Early April)	Review the overarching preamble and new versions of segment introductions and actions by the segment teams, based on guidance from HELCOM 42-2020		
			PRESSURE 14-2021, Week 13-16 April 2021	Drafting the Annex with supplementary information for actions under the mandate of PRESSURE
	(HOD intersessional meeting, April 2021)	Review the overarching preamble and segments Agree on actions as far as possible		
			HELCOM-VASAB MSP 22-2021, 20-21 April 2021	Drafting the Annex with supplementary information for actions under the mandate of HELCOM-VASAB MSP
	(DG BSAP segment teams, if needed, April 2021)	Review the segment introductions and actions based on guidance from HOD intersessional meeting		

Month	BSAP main text		Annexes	
	Meeting/group and time	Task	Meeting/group and time	Task
May	(DG BSAP, April-May 2021)	Review the overarching preamble and segment introductions and actions based on guidance from HOD intersessional meeting		
			AGRI 11-2021 or intersessional meeting, 27-28 April 2021	Drafting the Annex with supplementary information for actions under the mandate of AGRI
	(HOD intersessional meeting, if needed, May 2021)	Review the overarching preamble and segments Agree on actions as far as possible		
	(DG BSAP, if needed, May 2021)	Review the overarching preamble and segment introductions and actions based on guidance from HOD intersessional meeting		
			GEAR 24-2021, 18-20 May 2021	Drafting the Annex with supplementary information for actions under the mandate of GEAR
June	HOD 60-2021, 3-4 June 2021	Approval of the updated BSAP		