



Document title	Swedish comments to document 5-8
Code	5-13
Category	CMNT
Agenda Item	Agenda Item 5 – Update of the Baltic Sea Action Plan
Submission date	2.12.2020
Submitted by	Sweden
Reference	Reference to relevant meeting decision

Background

This document contains Swedish comments to document 5-8 to HOD 59-2020. The comments are made based on a comparison of the texts and the guidance document 3-2 “Drafting the updated BSAP” to DG BSAP 1-2020, and document 3-5 “How to draft the updated BSAP” to HOD 57-2019. Sweden prefers to keep closer to the existing agreements and guidance made on the structure and style of the updated BSAP and also proposes how operative sections and list of actions could be arranged, including to place some actions outside of the BSAP. In this context the view of HOD 57-2019 can also be recalled, e.g. “that the updated BSAP should be a relatively short and easy to read document” (Outcome para 3.27) and “the importance of proposing a limited number of focused and readily conveyable actions of political interest” (Outcome para 3.5).

Action requested

The Meeting is invited to discuss the proposal by Sweden and agree on the way forward for drafting the updated BSAP.

Swedish comments to document 5-8 to HOD 59-2020

The comments are aimed as a basis for further discussion. They do not represent a final Swedish view.

Harmonisation of texts is needed across segments. For this purpose, the interpretation of the guidance given from HOD should be discussed in relation to the drafts. We find that the structure can vary between segments if motivated by the topics, but a certain level of recognition in structure is needed. We propose a discussion of what the purpose of each piece of text is, and generally to shorten the text substantially to make room for strategic decisions/aspirations.

Therefore we propose specifications of the content, related to the elements included in the instruction from HoD (Doc 4-11 to HoD 58). This document includes:

1. General comments
2. Proposals on the content of Segment Preamble related to HoD instructions
3. How to arrange the operative segment; providing an example on eutrophication
4. How the list of actions can be arranged
5. How to use the annexes

1. General comments:

- The texts should clearly lay the paths towards the actions we propose. The text should not describe topics for which we have no actions.
- The texts should clearly relate to the ecological and management objectives preliminarily agreed at HELCOM 41-2020 and we propose to carry out an analysis on how the actions (existing and new) match the objectives as soon as possible.
- Texts should reflect Helcom actions and a Baltic perspective and only refer to global/EU work where clearly relevant.
- This plan will point out the direction of work for the next 9 years, certain information included will easily be outdated, and in this case we should avoid high levels of details in BSAP itself (such as percentage or tonnes). Some types of detailed information (e.g. change in environmental status between 2011 and 2016) may also not be relevant after Holas III.

2. Proposals on the content of Segment Preamble related to HoD instructions (HOD 58 doc 4-11).

SE comments (blue) related to guidance (black)

Suggested length: Maximum 2 pages including visualizations

SE proposal: to shorten the current texts substantially and to avoid basic topic information. This is an update and not a new plan, so we do not need to reason very much about how the ecosystem works, or why we need measures. Some text might be better/sufficiently expressed with visualisations.

Suggested division of tasks in 2021: Drafting led by Secretariat, further work to be taken on by (respective lead countries in) the Drafting Group.

SE proposal: Before each meeting, the draft should be distributed to the representatives in the group and comments should be provided and compiled by the secretariat in advance.

The segment preambular 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.

SE proposal: Aspirations and strategic decisions are now largely missing. A discussion needs to start on their role and placement in the BSAP. See additional proposals under the section “How to arrange the Actions”, below.

HELCOM recommendations and other relevant commitments are also still largely missing from the preambles. However, we propose to address these at a later stage of drafting.

- Link of segment to relevant climate change parameters and, if possible, key messages.;

SE proposal: We propose that the last point can be drafted very briefly based on the outcomes of the Climate change fact sheets under production by EN Clime. It should also be considered how the information relates to overarching statements on climate, and at a later stage if it is better to collect all this information in the horizontal segment.

- Action areas;

SE proposal: To indicate action areas as specific components seems unnecessary. We propose to instead reflect different type of action areas (e.g. sectors or other relevant themes) in the organization of actions. We would also like to see a stronger emphasis on the management objectives as a structuring element. See additional information under the section “How to arrange the Actions”, below.

- Link to relevant SDG;

SE proposal: We would propose not including a specific header on this. Though links to SDGs should be included, we would propose to find ways of linking from specific HELCOM activities or objectives to specific SDG targets as exemplified in document 2.4 to HOD 55-2018.

- Include cross-references with other segments.

SE proposal: The general linking between segments is less relevant than the specific links between activities and other segments. If kept at a general level (e.g. activities to reduce environmental impacts from shipping may contribute to reducing pressure from hazardous substances), it may be better to visualise or put such information in the “About” part. We propose a discussion on how this can be done at a later stage.

Description of desired state (1/2)

SE proposal: The desired state is already formulated through the ecological objectives and should be listed here. The component should be inserted early in the preamble. We propose not to formulate any new narrative text on desired state. If felt necessary, the ecological objectives could be further explained here.

Description of current state (1/2 page)

SE proposal: Should only briefly describe status and how far we have come/improvements noted. The pressures and the main contributing activities could be reflected here, if it is motivated to address them with actions later. We could also consider if figures/visualisations express this sufficiently, without text.

3. How the list of actions can be arranged

The draft BSAP contains over 200 actions Including actions of aspirational character, concrete measures that can have direct positive effect on the Baltic Sea environment as well as actions of supporting character. The mere magnitude of actions makes it difficult to grasp the potential of BSAP actions to improve the state of the Baltic Sea. We propose a discussion on how the actions could be arranged and

condensed without losing any of the proposals that will be agreed by HOD. The aim is to facilitate understanding of the BSAP and focus on key decisions for improvement.

Gather actions of more strategic or aspirational character in the pre-amble or the beginning of the presentation of actions under the operative sections (see “How to arrange the operative segment” below). To adopt the RAP on underwater noise would be an example of a strategic decision. There are also several proposed actions that cannot be assessed in terms of achievement that could rather be lifted as aspirations. For example, proposals to cooperate with international initiatives could be more suitable to lift in preambular text than in the list of actions.

Avoid duplication with already existing agreements. It has been agreed that HELCOM Recommendations will be part of the HELCOM follow-up system. We note that the proposed rewrites of existing actions and new actions some time overlap to large degree with paragraphs of HELCOM Recommendations. This could create a parallel and incoherent follow-up system since new targets and deadlines are provided in the BSAP. In such cases it is proposed that the updated BSAP includes a commitment to update the relevant Recommendations. Examples of overlaps can be found for Recommendation 35/1, 37-2, 40-1, 28E-7, 28E-8, but this could be the case also for other Recs.

Explore options for giving actions with a direct effect on the environment higher attention than supporting actions. Solutions for this could include; to place supporting actions in the annexes, or to place supporting actions to be implemented jointly as part of the Working Groups work plans. Especially for concretizations of existing agreements, as long as the link between concretization and original is clearly present. For any of these options to be acceptable we need to ensure mechanisms for follow up and reporting, so that the actions are not lost. Including these concretisations in explorer (updating the original) will ensure that there is a follow up, work allocation, and deadlines.

Explore options for giving actions with a direct effect on the environment higher attention than supporting actions. We see two possibilities in resolving this; to place (some of the) supporting actions in the annexes, or to place supporting actions to be implemented jointly as part of the Working Groups work plans. Especially for concretizations of existing agreements, as long as the link between concretization and original is clearly present. For any of these options to be acceptable we need to ensure mechanisms for follow up and reporting, so that the actions are not lost. For existing actions this could be met simply by including the concretized version of the actions in the HELCOM Explorer, while retaining information and a link to the original decision. Including these concretisations in the Explorer (updating the original) will ensure that there is a follow up, work allocation, and deadlines.

Consider the possibility of aggregating actions in separate decision documents. This is already the case of the RAP underwater noise, Roadmap on MSP etc. It could be explored to do the same for e.g. actions related to hazardous substances as part of the Swedish proposal to “Develop an action plan for hazardous substances”. Another topic with many proposal on separate actions is benthic habitats. It has been proposed to “Create and implement an action plan/toolbox for restoration of habitats”. It could be considered to expand such action plan to also include actions related to monitoring and mapping of seabed habitats.

4. How to arrange the operative segment; providing an example on eutrophication

There should be a “storyline” in the structure which clearly points towards the actions to be agreed, through ecological objectives, management objectives, aspirations, targets and follow up for our work. Discussion would be useful on how we could arrange it, for example (very rough idea) as follows:

Content (not header)	Example text
Desired state	Goals and objectives <i>"the overall goal is a Baltic sea unaffected by eutrophication, characterized by ..."</i> (ecological objectives inserted)
Present state	<p><i>A slight long-term improvement of the Baltic Sea eutrophication status has been demonstrated, which reflects an improved eutrophication management. However, in 2021 still 96% of the region is still below good eutrophication status, including the whole open sea and 90% of the coastal area.</i></p> <p>[Status and how far we have come/improvements noted. Main pressure and main contributing activities not yet sufficiently addressed could be mentioned in the case they have been identified through previous work.]</p>
The way to get there: management objectives	<p><i>To reach the goal, the management objective is... (to be inserted).</i></p> <p><i>These are in line with/will contribute to SDG targets xx, xx and xx</i></p>
(targets, if available)	<p><i>This is operationalized by the pressure reduction targets (MAI/NIC) OR Helcom CP:s have agreed that a reduction of input is needed as shown in the table below / of xx %....</i></p> <p>[For segments where targets is missing the need to develop targets could be highlighted as relevant].</p>
Activities to reach the goal, organised to relate to management objectives (where possible). <i>Strategic decision or aspirations could be included here, just before the actions lists, or in the pre-amble for the segment.</i>	<p><i>To manage this, we will ensure sustainable agricultural practices....</i></p> <p><i>Strategic decisions/aspirations inserted, e.g. :</i></p> <ul style="list-style-type: none"> • <i>adopt the RAP xx</i> • <i>update recommendation x by year xx</i> <p>Specific actions inserted: [Actions listed, thematically. Themes differ between segments as suitable. For the Eutrophication segment it may be suitable with sectors but for the Sea-based segment it may be more suitable to list the action by the management objectives that are already arranged around different activities/sectors]</p> <p>For example (taken from Eutrophication draft segment): <i>Key tools to achieve this is...[strategic decision, aspirations]</i></p> <ul style="list-style-type: none"> • <i>A circular economy, promoting sustainable production and consumption.</i> <i>We therefore agree to implement The HELCOM regional nutrient recycling strategy, including measures to be applied for smart nutrient management to secure the productivity of agriculture and minimizing nutrient loss.</i> • <i>Continuous cooperation with the River Basin Authorities, to ensure that river basin management plans (...) are sufficient to achieve the BSAP goals.</i> <p><i>Furthermore, the following specific actions have been agreed:</i></p> <ul style="list-style-type: none"> • (list/table), [potentially in a table arranged according to management objectives or major activities that need addressed]
Follow up	<p>For ecological/management objectives/actions respectively This could be described cross sectors in the "About" section,</p>

5. How to use the annexes

The annexes should be used to avoid that the operative sections become too lengthy, for example by including the rationale behind the action and other supporting information. Sweden notes the view of Pressure WG that the annexes should only contain minimum information. We support that the annexes should be maintained, and in line with the layout in document 3-5 to HOD 57-2019. Further instructions or examples of what is asked for might facilitate completion, and avoid that the annexes develop into implementation plans, see example below. The designation of working/experts groups to implement the actions could be carried out in parallel or at a later stage and do not need to be included in the annexes by time of adoption of the BSAP. The content of the annexes should be developed so that they can be easily used and transferred to the follow up tool HELCOM Explorer, to follow up the implementation of the updated BSAP.

Action	Target year	Rationale	Potential effect (if available)	Implemented by	Follow-up/Criteria/Indicator for achievement
Measure xx	Year	<i>Briefly from the synopsis and (if relevant) SOM analysis, whether it addresses a gap/major issue</i>	<i>From the synopsis/Som work</i>	Contracting parties or Helcom (joint)	