



Document title	Finnish comments to document 5-8 and 5-10
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Agenda Item	5 - Update of the Baltic Sea Action Plan
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Submitted by	Finland
Reference	

Background

This document contains comments by Finland to document 5-8 and 5-10.

Action requested

The Meeting is invited to take note of the comments by Finland to documents 5-8 and 5-10.

FINLAND's GENERAL comments to document 5-8

There will be a separate excel sheet commenting on the actions and measures

Finland would like to thank the Secretariat for the great amount of work put in to leading and coordinating the work on compiling the first draft of the updated BSAP. It is good to see the document taking form.

In general, the structure chosen seems to work well. We have provided numerous comments as a response to questions in document 5-10. Here is only a summary and the most important points:

-Structure: Lift biodiversity segment as the first segment since the ultimate aim is to protect species, habitats and the ecosystem. Ecosystem health features as the top issue also in the graph of the introductory section. In addition, consider deleting the annexes and including the information on measures therein to the segments (e.g. short action description, rationale, potential effect, target year, national/joint) and in work plans of the groups and the HELCOM Explorer (e.g. which groups are to work on the implementation, indicators). Consider making reference to implementation in a strategic manner in the preambular text and include a new sub-segment on implementation as the last part under horizontal actions. It could include general information and as necessary agreement about the plans and timelines for implementation. Preferably the annexes would be omitted from the BSAP2. They increase the length and always result in a complex and layered, lazy author's document.

-The upcoming work on BSAP2 should focus primarily on actions and the work should be lifted to the managerial, more negotiation style -level (BSAP DG, HOD), only consulting the experts (WGs) on specific issues, if not the groups, in some cases even via national contacts.

-As for the segments' preambular texts, we wonder if there are pieces of information that could be shortened further, such as the connections to other themes and contribution to implementing other policy frameworks or treaties.

Please see further detailed comments under document 5-10

Answers to questions in document 5-10

Questions for providing guidance: Preamble

- Should the preamble include a paragraph on climate change mitigation and on recognizing the socio-economic benefits of implementing the measures and actions?

VERY SHORTLY YES, TAKING INTO ACCOUNT THAT IT IS NOT THE ROLE OF THE BSAP OR HELCOM TO MITIGATE CC AND THAT ECONOMIC BENEFITS ARE COVERED IN HA-SEGMENT.

- Is the content of the introduction fit for purpose, and if not, what is missing/needs to be changed?

IT IS RELEVANT, THERE MAY BE A NEED AT A LATER STAGE ADD SOME STRATEGIC REFERENCE TO THE THEMATIC SECTIONS, INCLUDING HORIZONTAL ACTIONS. IN ADDITION, IT WOULD BE GOOD TO NOTE PLANS FOR IMPLEMENTATION. WE PROPOSE TO INCLUDE RELEVANT INFORMATION FROM THE ANNEXES INTO THE SEGMENTS THEMSELVES INSTEAD OF THE ANNEXES TO GIVE FURTHER INFORMATION ABOUT THE ACTIONS AND ALSO INFORMATION ABOUT THE IMPLEMENTATION.

WE SHOULD FOCUS OUR UPCOMING WORK ON THE ACTIONS NOW, RATHER THAN THE INTRODUCTORY TEXTS! THIS SHOULD BE CLEAR ALSO IN THE TIME TABLE PROVIDED IN THE ANNEX OF THE DOCUMENT – I.E. MORE FOCUS ON FINALISING THE ACTIONS!!! IN THE TIME TABLE THE ROLE OF THE HODS VS. BSAP DG AND WORKING GROUPS SHOULD BE CLARIFIED: IT IS NOW TIME TO LIFT THE WORK ONE LEVEL UP TOWARDS A NEGOTIATION PROCESS, E.G. GIVE A BIGGER ROLE TO BSAP DG AND HODS INSTEAD OF THE WGS.

- 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)?

ANY MAJOR UNDERTAKINGS FOR THE FOLLOW-UP, E.G A REPORT ON THE IMPLEMENTATION TO THE NEXT MINISTERIAL MEETINGS (BASED ON THE EXPLORER?) AS WELL AS STATUS ASSESSMENTS SHOULD BE INCLUDED WITH THE YEAR. IF THERE IS HOWEVER, A LOT OF DETAILED INFORMATION ABOUT THE FOLLOW-UP, THEN IT WOULD BE REASONABLE TO ONLY INCLUDE THE MAJOR ISSUES IN THE PREAMBULAR PART AND CONSIDER INCLUDING A SEPARATE SECTION ON IMPLEMENTATION IN THE END OF THE HORIZONTAL ACTIONS SEGMENT. LET US PLEASE AVOID THE ANNEXES.

Segment introductions:

- 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?

VERY SHORT! WITH THE ASSUMPTION THAT THE READER KNOWS THE PHENOMENON, HOWEVER, SHORT STATUS INFORMATION IS OK (TO BE LIFTED FROM OPERATIVE PART) AND THE LIST OF PROBLEMS AS USED UNDER BIODIVERSITY SEGMENT WAS GOOD. THAT COULD BE USED IN OTHER SEGMENTS AS WELL.

- 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?

IT IS NOT CLEAR WHAT IS MEANT WITH THE VISUALISATION BUT IF THERE IS GOOD VISUALISATION THEN TEXT CAN BE REALLY SHORT. TEXTS COULD BE SHORTENED ESPECIALLY REGARDING CONNECTIONS TO OTHER SEGMENTS/THEMES AND OTHER TREATIES, INCLUDING SDGS.

- Should all the segment introductions have the same sub-headings? If yes, what should the headings represent?

SAME STRUCTURE SHOULD BE FOLLOWED, HENCE SAME SUB-HEADINGS CAN BE USED, HOWEVER, IN THE END THE SUB-HEADINGS MAY TURN OUT UNNECESSARY AS THEY ALSO LENGTHEN THE SEGMENT.

- Can the length of the introductions vary across segments? Should 2 pages including visualizations still be the maximum length?

2 PAGES IS A GOOD GUIDELINE, HOWEVER, FOR EUTROPHICATION IT IS IMPORTANT TO HAVE THE MAI AND NICS EXPLAINED, WHICH MAKES THE TEXT LONGER. SEABASED IS ALSO A SEGMENT WITH VARIOUS THEMES AND MAY REQUIRE A LONGER INTRODUCTION.

- 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)?

AT THIS POINT OF TIME WE WOULD LEAVE THE DOOR OPEN FOR THESE IN CASE THEY ARISE NATURALLY DURING THE FURTHER PROCESS BUT WOULD NOT FORCE THEIR CREATION.

Horizontal actions:

- Are all relevant topics included under the horizontal actions segment or should additional topics such as hot spots be added?

COULD IMPLEMENTATION OF THE BSAP2 BE INCLUDED IN THAT PART AND THE REMAINING INFORMATION FROM THE ANNEXES THAT DOES NOT FIT THE SEGMENTS OR EXPLORER BE INCLUDED THERE?

- Is the name of the horizontal actions segment sufficiently explanatory or should it be changed, alternatively better defined in the introduction?

WHY NOT "CROSS-CUTTING ACTIONS" BUT HORIZONTAL IS OK AS WELL?

- Are the introductions of appropriate length and content?

THEY ARE PARTLY TOO LONG AND CONTAIN TEXT THAT IS SO GENERAL THAT THERE IS NO ADDED VALUE.

Operative sections:

MAIN QUESTION HERE IS THAT HOW WILL THE ACTIONS, WHICH ARE THE MOST IMPORTANT PART OF THE BSAP2 BE PRESENTED?? INCLUDING ONLY A TITLE SEEMS TOO LITTLE, WOULD IT BE POSSIBLE TO INCLUDE EACH ACTION WITH THE TITLE AND A FEW SENTENCES THAT GIVE FURTHER INFORMATION ON THE RATIONALE AND WHAT WOULD BE DONE BY TRANSFERRING INFORMATION PROVIDED IN THE SUPPLEMENTARY MATERIAL/ANNEXES TO THE MAIN BODY OF THE BSAP/THE SEGMENTS. IT IS ALL VERY RELEVANT INFORMATION AND AFTER ALL THE ACTION ARE THE CORE OF THE BSAP! IN ADDITION, ANNEXES ARE ALWAYS A LAZY SOLUTION, NOT AN ELEGANT SOLUTION AT ALL!

- 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?

IT WOULD BETTER FIT UNDER THE INTRODUCTORY BACKGROUND TEXT. IT ALSO SEEMS THAT THERE IS SOME REPETITION IN REGARD TO TARGETS AND OBJECTIVES.

- 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?

PLEASE MAINTAIN THE CODING PROVIDED TO HOD59 TO ENABLE TRACKING OF THE ACTIONS. BSAP DG SHOULD TAKE OVER FURTHER FORMULATION OF THE ACTIONS FOR HODS RATHER THAN EXPERT GROUPS WHICH COULD BE CONSULTED WITH SPECIFIC QUESTIONS AS NECESSARY OR VIA NATIONAL CONTACTS.

- Could new proposals for actions, where gaps are identified through the finalization process, still be submitted after HOD in December 2020?

RATHER NOT BUT IF ABSOLUTELY NECESSARY, THEN YES. E.G. ARE THERE ANY ACTIONS WITH REGARD TO ACIDIFICATION, E.G. MONITORING OF ACIDIFICATION AND DEVELOPMENT OF A REGIONAL ACTION PLAN TO ADDRESS ACIDIFICATION IN THE BALTIC SEA?

Annexes

- Does the proposed content of the annexes provide the relevant information to guide future assessment of implementation and provide context for the actions?

YES, THEY SEEM TO DO SO. IN ADDITION THEY CONTAIN IMPORTANT RATIONALE AND POTENTIAL EFFECT FOR THE ACTIONS AND HENCE THEY SHOULD BE CONSIDERED TO BE INCLUDED IN THE MAIN BODY OF THE BSAP2 INSTEAD OF THE ANNEXES!

- Would having the annexes as a separate supporting document, outlining the plan for implementation of the actions in the BSAP, be more suitable? IN FACT THE INFORMATION CONTAINED IN THE TABLES, EXCEPT PERHAPS THE REFERENCE TO THE WG AND EG AND INDICATOR, IS ALL VERY RELEVANT INFORMATION THAT IS MISSING IN THE MAIN BSAP2 TEXT FOR ACTIONS (ESPECIALLY THE RATIONALE AND POTENTIAL EFFECT TOO) INFORMATION ON IMPLEMENTATION COULD BE DEVELOPED INTO A SUBSECTION ON ITS OWN UNDER THE HORIZONTAL ACTIONS AND THE STRATEGICALLY MADE REFERENCE TO IN THE PREAMBULAR TEXT. ALL THE DETAILS OF WHICH WORKING GROUP OR EXPERT GROUP WILL WORK ON THE IMPLEMENTATION SHOULD GO IN THE EXPLORER AND IN WORKPLANS OF THE GROUPS..