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<b>Document title</b>	Comments to proposed new actions for the updated BSAP
<b>Code</b>	5-9
<b>Category</b>	CMNT
<b>Agenda Item</b>	5 - Update of the Baltic Sea Action Plan
<b>Submission date</b>	24.11.2020
<b>Submitted by</b>	WWF and CCB
<b>Reference</b>	Outcome of <a href="#">HELCOM 40-2019</a> ; <a href="#">Document 4-4</a> and <a href="#">Outcome</a> of HELCOM 41-2020; Notes from BSAP UP Workshops; Outcomes of <a href="#">MARITIME 20-2020</a> , <a href="#">PRESSURE 13-2020</a> , <a href="#">AGRI 10-2020</a> , <a href="#">RESPONSE 28-2020</a> , <a href="#">STATE &amp; CONSERVATION 13-2020</a> , <a href="#">FISH 12-2020</a> ; doc. <a href="#">5-8</a> and <a href="#">5-8-Att.1</a> ; <a href="#">Synopses</a> of new proposed actions submitted by WWF and CCB;

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## Background

In the process of providing new content for the updated BSAP, HELCOM 40-2019 agreed that synopses on potential new HELCOM actions can be submitted by the Contracting Parties, HELCOM subsidiary bodies, international projects and HELCOM Observers. Relevant synopses were prepared jointly by the NGO community and submitted to HELCOM in 2019 and early 2020 with the focus on potential new measures/actions, as well as strengthening and improving existing measures, to reduce pressures on the Baltic Sea and ensure overall protection and restoration of its biodiversity (see Attachment).

In the hope for the updated HELCOM BSAP to contribute to reaching Good Environmental Status, BSR NGOs have collectively produced a [Shadow Plan](#) setting recommended actions across all segments of the BSAP to curtail biodiversity loss and enhance the resilience of the Baltic Sea in light of ongoing and future climate change impacts.

WWF and CCB are encouraged by the fact that many NGO synopses and recommended actions of the Shadow Plan have been endorsed for consideration by the Heads of Delegation. However, we would like to draw your attention to a number of significant and cost-efficient actions that have been disregarded or watered down, despite the scientifically-based opinion of the expert community. We are also concerned that contributions by several well-based fundamental and applied projects by the region's science community and relevant stakeholders through BONUS and Interreg have not been included in the revision for potential new actions. These *i.a.* include:

- **Actions to reduce underwater noise:** continuous and impulsive underwater noise has been recognized since 2010 as a pressure onto the Baltic marine environment with serious impacts on many marine species; the [current level of knowledge](#) is adequate to act in accordance with the precautionary principle and ensure that underwater noise is reduced by several measures proposed and available.
- **Action to save the eel:** suggested measures addressing the endangered European eel, and specifically the banning of recreational fishing, have been dismissed by most of the Contracting Parties despite the call for action at global (CMS) and European level. This is particularly disturbing since the most recent scientific advice ([ICES 2020](#)) shows no improvements in eel stocks and the proposal to close at least recreational fishing is [supported and requested](#) by the anglers themselves.
- **Actions to reduce the input of hazardous substances:** both cost-efficient source-reduction measures ([restrictions on over-the-counter pharmaceuticals](#)) and end-of-pipe technologies (promotion

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of [constructed wetlands as an additional step in waste water treatment](#)) were not supported, despite [proof](#) of their effects to reduce inputs of hazardous substances.

- **Actions to reduce nutrient inputs from agriculture:** introduction of economic instruments to discourage the overuse of mineral fertilizers ([levies for mineral N and P](#)) and [measures to limit livestock densities](#) in agriculture were seen as too costly for the sector and not endorsed. Instead mostly voluntary measures were supported. With reference to the current CAP, voluntary measures have not [incentivized](#) the appropriate reduction of fertilizer the BSR and there is continued overuse of nutrients derived from mineral fertilizer and manure.
- **Actions to reduce the input of litter:** as abandoned, lost or otherwise discarded fishing gear (ALDFG) is [considered](#) to be the most deadly form of marine litter, prevention measures should be prioritized in order to reduce the scale of the problem. Fishing gear marking and gear loss reporting are considered to be the foundation of prevention, therefore it is crucial that the updated BSAP recognizes the importance of their proper implementation on national and regional level, as indicated in the proposed [measure](#).
- **Actions addressing climate change:** The suggested actions for the updated BSAP so far include very few concrete measures on how to tackle the climate crisis in the BSR. Without significantly reducing greenhouse gases and halting biodiversity loss by building marine and coastal resilience, achieving a healthy and thriving Baltic Sea will not be possible. We strongly urge including binding targets for combatting climate change and developing a roadmap to achieving climate neutrality (net zero emissions) in the Baltic Sea Area by 2040, as proposed in the Shadow Plan. This must include climate adaption measures of restoration of coastal and marine habitats to build climate resilience.
- **Actions to protect biodiversity:** We recognize that a measure to establish an effectively and equitably managed, ecologically representative and well-connected system of highly protected marine protected areas (MPAs), covering a minimum of 30 % of the Baltic Sea area by 2030 has been endorsed by State and Conservation. However, we are concerned that current measures do not adequately cover MPA management and measures regulating human activities in MPAs. All provisions of the new EU Biodiversity Strategy for 2030 with regards to MPAs should be met, and this includes that at least a third of designated MPAs should be strictly protected areas (i.e. no-take and no-use areas). Therefore, we ask the Heads of Delegation to clearly set a 10% target for strictly protected areas.

WWF and CCB would like to ask the HELCOM HODs to assure that the revised BSAP contains measures for all relevant pressures on the Baltic Sea – measures which have set timelines for prompt implementation and which will show a measurable reduction of the pressures. As the SOM analysis has shown, we have to prepare for bearing extra costs for actions, as inaction and business-as-usual will not bring us any closer to the GES by 2030.

### Action requested

The Meeting is invited to [consider](#) the comments by WWF and CCB when adopting the list of new actions for the updated BSAP.

## Attachment. State of synopses for new measures within BSAP update, submitted by WWF and CCB

(green – endorsed for submission to HODs, yellow – not endorsed in original format, orange – not endorsed)

Title of synopses	Link to latest version	Description of proposed action	Comments on endorsement
Mandatory use of Acoustic Deterrent Devices or other effective mitigation measures to minimize bycatch of the Baltic Sea harbour porpoise ( <i>Phocoena phocoena</i> )	<a href="#">Acoustic Deterrent Devices or other mitigation measures to minimize bycatch Baltic Sea harbour porpoise updated</a>	Contracting parties should agree on mandatory use of Acoustic Deterrent Devices (ADDs), or correspondingly effective mitigation measures, in all gillnet and trammel net fisheries east of E13.5° and north to the Finnish Archipelago Sea at N 60.0°, to minimise and where possibly eliminate harbour porpoise bycatch in the entire range of the Baltic Sea harbour porpoise population. The use of ADD should not be linked to size of boat etc but to the gear type in use. Potentially, if in the relevant areas, also recreational gears should have ADDs.	S&C: Yes, but taking into account the comments and the need to refine the final action. <a href="#">FISH 12-2020</a> : Not endorsed
Strengthening collection of obsolete pharmaceuticals from public in the Baltic Sea region	Strengthening collection of obsolete pharmaceuticals from public in the Baltic Sea region	Collection of pharmaceutical waste (obsolete pharmaceuticals) from public is not obligatory required in some countries of the Baltic Sea catchment area. Legal requirements for pharmacies to participate in collection of obsolete pharmaceuticals are set in Denmark, Estonia, Lithuania, Sweden, and in some regions of Germany. Countries, including Finland, Latvia, and Poland have voluntary schemes of collection of obsolete pharmaceuticals from public, and in Belarus, Russia, and Ukraine there are almost no any collection opportunities for public.	
Establish an effectively and equitably managed, ecologically representative and well-connected system of highly protected marine protected areas (MPAs), covering a minimum of 30 % of the Baltic Sea area by 2030. All MPAs shall include fully closed zones (complying with IUCN 1a category <sup>1</sup> ) or be fully closed in their entirety, depending on the conservation objectives and needs of the specific site.	<a href="#">An effectively and equitably managed, ecologically representative and well-connected system of highly protected MPAs updated</a>	The existing network of MPAs in the Baltic Sea meet the 10% coastal and marine area target by 2020, yet falls short of living up to its other requirements, since it does not form an ecologically coherent network (it fails in e.g. connectivity , ) and it is not well-managed (see footnote 2), as required by international commitments (HELCOM recommendation 35/1, Aichi biodiversity target 11, the UN Sustainable Development Goal 14). Currently, only 7% of the total 16% marine area designated as MPAs in the Baltic Sea have a management plan in place (see footnote 2). The current network is also inadequate for European Union commitments (for Helcom contracting parties, that are also EU member states) in reaching Good Environmental Status as defined in the MSFD. In order to i.a. halt biodiversity loss and mitigate the effects of climate change the MPA network must cover at least 30 % of the Baltic Sea by 2030 and each MPA shall include fully closed zones (complying with IUCN 1a category (see footnote 1)) or be fully closed in their entirety, depending on the conservation objectives and needs of the specific site. Appropriate resources and investments for effective implementation, management, monitoring and compliance by all actors in existing MPAs must be urgently established. All existing and future MPAs in the network shall have management in place, that is suitable and effective for reaching and/or maintaining the conservation objectives of the respective area. Monitoring the effectiveness of the individual MPAs, but especially the network of them, on a Baltic Sea wide scale shall be implemented as fast as possible.	S&C: conditional on that highly is removed, as that the approach to fully closed zones (or related terms) mentioned in the synopsis need to be re-considered. Closed zones (or related terms) should be identified and established based on merit and not arbitrarily included in every MPA. Inclusion of text on that MPAs should be nominated for inclusion in the HELCOM MPA network whenever possible. Should be considered for possible merger with existing action on 30% spatial protection.
Conclude a complete set of indicators for the assessment of fish stock health, also including size and age distribution	<a href="#">Conclude a complete set of indicators for the assessment of fish stock health, also including size and age distribution</a>	Currently, in implementing the BSAP as well as the MSFD, a key as is to secure healthy fish stocks. There is a lack of indicators to fulfil the assessment of all the three criteria indicative of a healthy fish stock. Besides fishing pressure, there must be a biomass level and an indicator for size and age structure in a fish population. The Baltic region should not wait for a wider discussion but settle acceptable indicators for our regional needs. HELCOM must commit to finalise operational indicators for all three criteria, and especially for size and age structure of a fish stock. Ongoing processes within ICES and HELCOM has reached a standstill and if the matter cannot be resolved	<a href="#">FISH 12-2020</a> : to include action to science agenda as: Initiate the process with the aim to conclude a more complete set of criteria to indicate the health of relevant fish stocks, besides

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		before 2021, it needs to be a prioritised action in the updated BSAP. HoDs should highlight this need, specifically asking the HELCOM FISH and HELCOM indicator work to cooperate with relevant experts to conclude this.	fishing pressure and biomass criteria also including size and age distribution.
Concrete steps to make progress on cooperation between HELCOM and fisheries management (e.g. Baltfish) to improve implementation of BSAP (revised)	<a href="#">Concrete steps to make progress on cooperation between HELCOM and fisheries management (updated)</a>	<p>A set of steps must be taken to make the needed cooperation between fisheries and environmental management officials and Ministries a reality, e.g. to develop the BSAP. The collapsed cod stock shows the urgency and is one of the key topics to address via cross-sectoral cooperation but most parts of the BSAP needs the same focused attention from several parts of the land, coastal and marine management.</p> <p>CCB propose a procedural process using a focused topic to start as soon as possible, but to also to embed cooperation into the new BSAP. As a test case, consider the creation of a “task force” to address the cod crisis here and now, involving experts from a range of HELCOM groups, national institutes, ministries and not only considering this for the updated BSAP.</p> <p>Cooperation needs to be formalised via:</p> <ol style="list-style-type: none"> <li>1. Agreeing on annual schedule for HELCOM FISH and Baltfish meetings to facilitate possibilities to feed input between the groups</li> <li>2. Create a terms of reference for how and what each “body” (agency, ministry etc.) is to deliver and on what time line and set such a ToR on the agenda for HELCOM and Baltfish in 2020</li> <li>3. Start with addressing a common understanding of ecosystem based management as a “case” by setting up a dedicated process for this as part of BSAP. (See separate CCB proposal on EBM for BSAP)</li> </ol>	Endorsed by <a href="#">FISH 12-2020</a> as revised: Further elaborate cooperation between BALTFISH and relevant HELCOM working groups to facilitate achieving of good environmental status.
Definition of “New Hot Spots” of nutrient input into the Baltic and subsequent targeted measures to reduce the source	<a href="#">Definition of “New Hot Spots” of nutrient input into the Baltic and subsequent targeted measures to reduce the source</a>	Using existing monitoring and reporting schemes (e.g. PLC), this measure aims at finding current Hot Spots of nitrogen and phosphorous input into the Baltic Sea. Building up on the measure of the last BSAP where Hot Spots of intensive rearing of cattle, poultry and pigs that were not fulfilling the requirements in the revised Annex III of the Convention were identified, this new measure would identify any current source, thus making it possible to tackle the sources of high nutrient input. Especially for phosphorous as an ending resource an efficient strategy for recycling instead of net loss into the Baltic has to be developed.	
Develop and promote the use of alternative fishing gear to replace gillnets with the aim of avoiding incidental by-catch of mammals and seabirds, and to be seal-safe	<a href="#">Development of alternative fishing gear to replace gillnets updated</a>	Contracting parties should intensify and coordinate the efforts to develop fishing gear suitable to replace gillnets in Baltic Sea fisheries. Today, there is a HELCOM process and a questionnaire to share information on alternative fishing gear and fishing techniques, and gear development is done by some institutions in some HELCOM countries. However, the development of new gear should be intensified and coordinated to increase synergies and cost effectiveness, and most importantly to speed up the process. Efforts needs to be intensified, both in coming up with entirely new solutions and in adapting existing alternative gear to local conditions. Coordination should take place regularly between HELCOM contracting parties through close collaboration between expert institutions. Sharing of experiences and organizing regular meetings/seminars/workshops on the latest developments is only one part. Active cooperation also in creating projects, testing and developing gears should be set as a norm to maximize use of funds and expertise. HELCOM secretariat and the FISH group should be the hub to gather and share information via e.g. HELCOM website.	S&C: Yes <a href="#">FISH 12-2020</a> : Endorsed as redrafted: Develop and promote the use of alternative fishing gear to replace gillnets with the aim of avoiding incidental by-catch of mammals and seabirds, and to be seal-safe

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Development of national and regional ALDFG mitigation policy papers and recommendations on how to approach ALDFG problem in the Baltic Sea in a systemic way.	<a href="#">Development of national and regional ALDFG mitigation policy papers and recommendations</a>	Practical strategies for mitigation of ALDFG problem in the Baltic Sea (e.g. technical recommendations regarding search and retrieval operations, mapping activities) should be complemented with national and regional ALDFG problem mitigation policy papers and introduced to national and regional policymakers, to ensure introduction of systemic solution to national and regional law.	PRESSURE 13-2020: Address ALDFG problem in the Baltic Sea in a systematic way by developing HELCOM guidelines and recommendations FISH: endorsed
Ensure effective implementation of the Landing Obligation (LO) as required by Common Fisheries Policy (CFP)	<a href="#">Ensure effective implementation of the Landing Obligation (LO) as required by CFP</a>	Landing obligation required by CFP (Article 15) aims to end wasteful discard practice in European seas. In the Baltic Sea LO is in place as of 2015, covering commercially exploited fish stocks which are subject to EU catch limits. Nevertheless a so called "discard ban" is not yet implemented in a sufficient way. European Commission in its report from 2019: COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the State of Play of the Common Fisheries Policy and Consultation on the Fishing Opportunities for 2020 recognises that compliance with the LO in the EU remains poor. Discarding practice which still occurs in the Baltic Sea (see references below) causes additional fishing mortality and thus contributes to the poor state of Baltic fish stocks. What is needed to successfully implement landing obligation is among others: a) adequate monitoring, control and enforcement to ensure compliance with LO b) testing and development of new fishing gears, techniques and methods to minimize and avoid discards (and by-catch) c) address landing obligation properly when setting Total Allowable Catches (TACs) by taking into account additional fishing mortality related to discards when setting TACs While most of these measures are under responsibilities of EU Fisheries Council (or of both together: EU Fisheries Council and European Parliament), it is essential that BSAP also recognizes the importance of and the need of full implementation of the landing obligation in order to secure healthy Baltic fish stocks.	Comment by <a href="#">FISH 12-2020</a> : The Meeting noted that with its current formulation, the action is not appropriate for the BSAP, but that revision to focus on selective fishing gear could be a possibility e.g. as follows "Take action to avoid unwanted catches."
Ensure no-special-fee system for marine litter applies to all passive fished waste, as well as all other wastes captured or generated in the Baltic Sea.	<a href="#">Ensure no-special-fee system for marine litter applies to all passive fished waste</a>	This measure is to ensure the no-special-fee system for marine litter applies to all passive fished waste.	
Establishing a harmonized eDNA methodology and start a baseline monitoring system throughout the Baltic Sea	<a href="#">Harmonized eDNA methodology and start a baseline monitoring system updated</a>	eDNA can be a very strong supporting tool to traditional monitoring and can is no longer be seen as a "science frontier" or an unverified method. On the contrary, the techniques and methods are becoming streamlined and the usefulness of analysing water samples with this method has proven itself as cost-effective, accurate and valuable as additional tool in environmental monitoring. CCB propose that HELCOM CP agree to start developing a regional harmonised approach to eDNA and to start baseline monitoring now. Tracking alien species, monitoring species movements (climate change effects), detecting rare species (not least upstream) to prioritise measures, analysing faeces and stomach content to complete food web studies etc would greatly benefit from a uniform approach making cross basins and Baltic wide comparisons without difficulties of differences in approaches and methodology.	S&C: Yes, but needs further description.

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Integration of work regarding mapping of ALDFG host areas and hot spots in the Baltic Sea region, based on the results of mapping activities held within national and international initiatives (such as the MARELITT Baltic project).	<a href="#">Integration of work regarding mapping of ALDFG host areas and hot spots</a>	Mapping of DFG host areas and hot spots improves the transparency around the ghost fishing issue and is an efficient and practical tool for visualizing the problem. The map as a tool substantially improves the strategic planning of crucial activities at sea, thus it should be standardized and implemented in the entire Baltic Sea region to help to determine cost-efficient retrieval operations and subsequently, improve the reception capacity at strategic harbours. Through improved transparency, the integrated map could help during spatial planning of marine activities, e.g. to avoid DFG clean-up actions to be held in sensitive or cultural heritage areas.	PRESSURE & FISH: No Proposed to be moved to the revised RAP ML
Joint action to form a common understanding of ecosystem based management by 2023	<a href="#">Joint action to form a common understanding of EBM by 2023 updated</a>	Ecosystem based management (EBM) is already embedded in most, if not all environmental legislations, international conventions and agreements, indeed including HELCOM. EBM is already well defined and needs no further development per se. Yet, there is a major problem in implementing this management approach due to either lack of will or understanding of what EBM means or requires. We propose that HELCOM contracting parties sets a target to, before the end 2023, develop a common understanding of what EBM means and requires of CPs and current management to move forward on implementing EBM and e.g. clearly state needed organisational changes and cross sector cooperation as well as interdisciplinary scientific advice/development of advice.	S&C, however DK wished that HOD should be presented with the decision of where this should be placed.
Updating the efforts to limit the impacts of dredging, sediment extraction and other bottom disturbing activities in the Baltic Sea	<a href="#">Limit the impacts of dredging, sediment extraction and other bottom disturbing activities</a>	Sediment extraction and disturbance is frequent in the Baltic Sea. It ranges from direct and indirect activities such as sand and gravel extraction, dredging to disturbance from trawl fisheries. CCB propose to collect existing measures, recommendations (19/1 Marine sediment extraction and 36/2 on Management of dredged materials) etc. to a more updated and complete list of measures to address the problem of bottom disturbance to safeguard the integrity of the sea floor, from the coast to open sea. <ol style="list-style-type: none"> <li>1. All extracting/dredging activities must have time limited permits</li> <li>2. All permits should be preceded by a full environmental impact assessment</li> <li>3. Dredging and extraction activities should be handled by the same authority</li> <li>4. All permits should contain requirements of monitoring after dredging/extraction has taken place</li> <li>5. All permits should include a requirement of compensatory measures</li> </ol>	
Establishment of a regionally agreed method for assessing in what ways loss and disturbance is causing negative effects on the marine environment.	<a href="#">Method for assessing in what ways loss and disturbance is causing negative effects</a>	Sediment extraction and disturbance is frequent in the Baltic Sea. It ranges from direct and indirect activities such as sand and gravel extraction, dredging to disturbance from trawl fisheries. A collapsed cod stock is now a reality. The few left are starving, are small and all measures having impact on cod and other fish stocks is more critical than ever to consider. Bottom integrity and benthic habitats are key to the cod and disturbances impairing benthic health must be considered as serious and a key part of the food web dynamics. Without a common framework and agreed assessment method, sea floor disturbances will continue to be handled via a piecemeal approach without considering wider and cumulative implications.	Proposal by FISH 12-2020: Implement a common approach to assessing and addressing negative effects on the marine environment caused by loss and disturbance of the seabed building on and utilizing the ICES advice and work by relevant expert groups.
Adoption of a moratorium on seabed mining in the Baltic Sea, including a moratorium on developing additional permissive regulations and exploitation and exploration contracts.	<a href="#">Moratorium on seabed mining in the Baltic Sea</a>	This measure is for HELCOM members to jointly adopt a complete moratorium on seabed mining in the Baltic Sea, including a moratorium on developing additional permissive regulations and exploitation and exploration contracts. This includes geological surveys, preparatory surveys, and similar activities.	PRESSURE: with exception for sand and gravel extraction

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<p>Nutrient-balanced fertilization to control nutrient surplus on farmland</p> <p><i>To be merged with <a href="#">"Annual field-level fertilization planning and farm-gate nutrient balancing for nitrogen (N) and phosphorus (P) should be a requirement for all farms in the Baltic Sea Region"</a></i></p>	<p><a href="#">Nutrient-balanced fertilization to control nutrient surplus on farmland</a></p>	<p>The main nutrient leakage source from agriculture is overfertilization practices. The Annex III Part 2: Prevention of Pollution from Agriculture, point 7-Application rates of nutrients, says "The application of nutrients in agricultural land shall be limited, based on a balance between the foreseeable nutrient requirements of the crops and the nutrient supply to the crops from the soil and the nutrients with a view to minimise eutrophication". Existing HELCOM regulations cannot secure balanced fertilization with a low nutrient surplus. More detailed requirements are necessary with the following amendments in Annex III, Part 2, para 7:</p> <ul style="list-style-type: none"> <li>• Introduce annual nutrient accounting practices at farm level and calculation of total nutrient surplus (incl. manure and mineral fertilizer) (as kg N/ha and kg P/ha) for each crop, at farms bigger than 20 ha or with more than 10 Animal Units (AU)</li> <li>• Introduce national tolerable nutrient surplus levels for nitrogen and phosphorus (kg N/ha; kg P/ha) at farm/field level, to reduce nutrient surplus in fertilization practices to reach nutrient balanced fertilization, especially in areas with risk for nutrient leakage</li> <li>• Phosphorus surplus as kg/ha, from farm/field nutrient surplus calculations, shall be set to zero or almost zero, to avoid surplus storage of phosphorus in soils</li> <li>• the full content of nutrients in manure will be forwarded as input to the nutrient accounting at farm/field level</li> <li>• manure should not be spread in autumn, because plants will utilize such nutrients only for a limited period</li> </ul>	
<p>Develop a HELCOM joint submission to IMO with the intention to recognize nutrients in cargo hold washing water as Harmful for the Marine Environment in the Baltic Sea. MERGED</p>	<p><a href="#">Nutrients in cargo hold washing water as Harmful for the Marine Environment</a></p>	<p>This measure is to develop a HELCOM joint submission to IMO, related primarily to capturing nutrients in cargo hold washing water. The joint submission should invite IMO to elaborate relevant new regulations for ships covered by the existing Annex V to MARPOL. This will include designating nutrients in cargo washing water as harmful for the marine environment, with the aim to eliminate the discharge of nutrients from ships. CCB suggests that all discussion is complete for a joint submission to IMO by 2023.</p>	
<p>Phase out all recreational fishing on eel by 2022</p>	<p><a href="#">Phase out all recreational fishing on eel by 2022 updated</a></p>	<p>The European eel is critically endangered. Currently most countries around the Baltic Sea still allow fishing for eel and including recreational fishing. ICES has repeated since 2003 that all anthropogenic induced mortality must be reduced to zero or as close to zero as possible. Under such circumstances, to allow for the taking of a critically endangered species for recreational purposes is simply unprecedented and unacceptable. It is a matter of national jurisdiction to close all recreational fisheries for eel and all CP in HELCOM should agree collectively to implement such a measure to further the survival of the species before the end of 2022.</p>	<p>S&amp;C: No, in the current formulation. FISH: Not endorsed</p>
<p>Develop an adequate network of Port Reception Facilities (PRFs) in Baltic ports to receive ship hold washing water</p>	<p><a href="#">Port Reception Facilities (PRFs) in Baltic ports to receive ship hold washing water</a></p>	<p>The availability of PRFs in Baltic Ports receiving cargo residues, or hold washing water, is insufficient. This action is to develop a network of PRFs to handle all cargo hold washing residues, recalling also the EU Directive 2019/883 on improving PRFs. CCB suggests that planning begin by 2021 for the installation or upgrading of PRFs in all Baltic ports, and that Baltic ports reach full capacity to receive ship hold washing water by 2025.</p>	

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<p>Prioritising mitigation measures in rivers for eel and other fish migration (revised by <a href="#">FISH 12-2020</a>)</p>	<p><a href="#">Prioritising mitigation measures in rivers for eel and other fish migration</a></p>	<p>Besides the preferable option to remove dams completely, mitigation measures to secure eel and other species migration up and downstream dams and hydropower stations have been designed, tested and verified to function well. Efforts upstream is seriously lagging behind in relation to fish in general but for weak swimmers and eel in particular. All CP should set a timeline to mitigate all major obstacles in most important rivers and either remove dams or install functioning mitigation measures such as sloped spaced bars for out migrating fish, and upstream passage for glass eel. Without such measures installed, no releases of relocated glass eel can be allowed and using public funds for such releases above hydropower stations without functioning mitigation must be considered wasteful and to deliberately inflict harm to eel.</p>	<p>S&amp;C: Yes, but SE cannot support the measure in its current form but if the changes are made it can be endorsed. FISH: Prioritising mitigation measures at dams (e.g. in connection with hydropower plants) for eel and other fish migration</p>
<p>Develop recommendations to support national strategies for manure management in the BSR specifically from horses, sheep, goats, and fur farming</p>	<p><a href="#">Recommendations to support national strategies for manure management in the BSR</a></p>	<p>There is no consistent approach to manure management for animal health or nutrient reduction from horses, sheep, goats, and fur farming across the BSR. The measure is to bring these manure sources into full consideration and integration with the ongoing HELCOM process to develop national strategies for manure management, in collection, storage, and in land use to better capture nutrients that cannot be collected from grazing areas or paddocks. Such strategies should also have a clear intention for relevant useage of the nutrients, as well as a timeline for implementation. CCB suggests that this HELCOM action be developed and agreed by 2022.</p>	
<p>Reduce nutrient losses to zero from dry bulk fertilizer storage and handling in Baltic ports <b>Introduction of best technologies, techniques and practices (BAT/BEP) to minimize nutrient losses from dry bulk fertilizer storage and handling in Baltic ports</b></p>	<p><a href="#">Reduce nutrient losses to zero from dry bulk fertilizer storage and handling in Baltic ports</a></p>	<p>We propose the introduction of best technologies, techniques and practices (BAT) to reach zero nutrient losses in fertilizer storage and handling, and encourage industry collaboration in an open innovation setting. CCB suggests that the initiation of HELCOM activities to coordinate development of BAT begin by 2021, and that BAT are being implemented in all Baltic ports by 2025.</p>	
<p>Reducing the impact of <b>continuous underwater sound</b> from recreational boating on marine biodiversity</p>	<p><a href="#">Reducing the impact of continuous underwater sound from recreational boating on marine biodiversity</a></p>	<p>The negative impact of underwater noise on several cetacean, fish and invertebrate species has been shown and documented, thus the reduction of underwater noise is an urgent issue that needs to be addressed with consequent measures. While assessment and monitoring are being put in place through the Regional Action Plan Underwater Noise, measures that take immediate effect are needed.</p> <p>In some areas of the Baltic the high density of recreational boats results in regionally and seasonally high noise pressure on the marine ecosystem. The noise sources are the engine and propeller, but also results from sonar/echo sounder systems that the boats use to locate fish and to monitor depth.</p> <p>For the reduction of noise from engine and propeller, it is suggested to reduce ship speed for all recreational vessels as an ad-hoc measure in pilot areas with noise sensitive species including MPAs designated for harbour porpoises or other known feeding or breeding areas of sensitive species. The resulting noise reduction is specific for ship propulsion systems and thus dependent on the ship type. Sonar/echo sounders should be designed to be switched on only when needed (no constant monitoring) and must use frequencies above 150 kHz. Simultaneously, an analysis of further potential to reduce noise from recreational boating in the Baltic (e.g. identification of noise hot spots and further areas where noise has to be reduced, development of a noise threshold for recreational boating in the Baltic) needs to be conducted.</p>	

Title of synopsis	Link to latest version	Description of proposed action	Comments on endorsement
Reducing the impact of <b>continuous underwater sound</b> on marine biodiversity [from shipping]	<a href="#">Reducing the impact of continuous underwater sound on marine biodiversity [from shipping]</a>	<p>The negative impact of underwater noise on several cetacean, fish and invertebrate species has been shown and documented, thus the reduction of underwater noise is an urgent issue that needs to be addressed with consequent measures. While assessment and monitoring are being put in place through the Regional Action Plan Underwater Noise, measures that take immediate effect are needed.</p> <p>It is suggested to reduce ship speed for all commercial vessels as an ad-hoc measure in areas with noise sensitive species including MPAs designated for harbour porpoises or other known feeding or breeding areas of sensitive species. The resulting noise reduction is specific for ship propulsion systems and thus dependent on the ship type. Further measures could complement this measure to optimise ship operation with respect to noise emissions. Simultaneously, an analysis of further potential to reduce noise from shipping in the Baltic (e.g. identification of noise hot spots and further areas where noise has to be reduced, development of a noise threshold for continuous noise in the Baltic) needs to be conducted.</p>	
Reducing the impact of impulsive underwater sound on marine biodiversity	<a href="#">Reducing the impact of impulsive underwater sound on marine biodiversity updated</a>	<p>The negative impact of underwater noise on several cetacean, fish and invertebrate species has been shown and documented, thus the reduction of underwater noise is an urgent issue that needs to be addressed with consequent measures. While assessment and monitoring are being put in place through the Regional Action Plan Underwater Noise, measures that take immediate effect are needed.</p> <p>For impulsive noise of any source a clear threshold for the whole Baltic Sea based on best available technique (BAT) and best environmental practice (BEP) is needed with immediate effect. This measure can be implemented immediately alongside monitoring to check its efficiency as the Baltic thresholds might need to be adapted as further data and knowledge become available. Regulations to limit noise at source should encourage alternative methods which generate less underwater noise for all activities. For example, alternatives to impact pile driven monopile foundations should be considered alongside other noise reduction methods for piling and Marine Vibroseis should be fully examined as an alternative to airguns for seismic surveys.</p>	
Reducing the impact of underwater sound from commercial shipping and recreational boats on marine biodiversity	<a href="#">Reducing the impact of underwater sound from commercial shipping and recreational boats updated merged</a>	(shortened, please see synopsis) Commercial and recreational shipping differ both in terms of the impact (relatively constant and mainly offshore vs. temporally very variable and mainly nearshore, respectively) and means of regulation (international vs. national, respectively). This means that they are best targeted by different measures.	
Preparation for remediation of munitions dumps and munitions contaminated areas to support the achievement of conservation objectives <a href="#">Development of BEP and control of threats posed by munitions, wrecks and other hazardous submerged objects in the Baltic Sea, including the preparation for the remediation of areas contaminated with munitions</a>	<a href="#">Remediation of munitions dumps and munitions contaminated areas</a>	<p>Desktop study: historical and contemporary document research</p> <p>Survey: investigations of munitions contaminated areas (e.g. sonar, underwater video, divers).</p> <p>Documentation: GIS supported data collation: e. g., position, type, condition, salvage.</p> <p>Decision support: processing of georeferenced information e. g., by DAIMON DSS, refer to DAIMON toolbox</p> <p>Risk analysis and measures: Evaluation of hazardous objects on the seabed on the basis of decision support results.</p> <p>Risk assessment, definition and, prioritisation of clearance requirements for munitions contaminated areas. Balancing associated risks of site-specific remediation options (e.g., leave as is, capping, monitoring, recovery).</p> <p>Development of national contingency plans for dealing with munitions contaminated areas in an</p>	

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		<p>open transparent process based on best available science.            Continuous evaluation of technical and scientific progress.            Development of methods for low-noise and low-pollution salvage (e.g. robotic technologies).</p>	
<p>Set a regional binding roadmap to achieve a climate neutral Baltic Sea region by 2040 and just transition to align with the 1.5°C threshold</p>	<p><a href="#">Roadmap to achieve a climate neutral Baltic Sea region by 2040</a></p>	<p>HELCOM countries should develop and implement a regional binding roadmap to achieve a climate neutral Baltic Sea region by 2040, including phase out of fossil fuel emissions and investment in low carbon energy technologies and energy efficiency and enhanced carbon sinks. The roadmap should also ensure and integrate a just transition to support and protect all actors involved in the process.</p>	<p>S&amp;C: As the far reaching implication of the proposed action reach beyond the scope of biodiversity and conservation the meeting considered it to be outside the mandate of S&amp;C and that is should be considered further by HOD.</p>
<p>Ship's ballast water and sediments management (BWM) by the HELCOM parties' domestic merchant fleets and naval forces as a supplementary measure to control introductions and secondary spread of Harmful Aquatic Organisms and Pathogens (HAOP) in the Baltic Sea.</p>	<p><a href="#">Ship's ballast water and sediments management by merchant fleets and naval forces</a></p>	<p>Each party of the Helsinki Convention should prevent the transfer of HAOP by the control and management of ship's biofouling and of ballast water and sediments in its ports and waters under its jurisdiction with respect to the BWM. The attainment of the relevant international agreements needs to be promoted. BWM Convention does not apply for ships only operating in waters under its national jurisdiction, warships and naval auxiliary ships, but these vessels could potentially introduce HAOP into the Baltic. Hence, each Party shall adopt appropriate measures without impairing operational capabilities, to act reasonable and practicable with BWM Convention. These assumptions should be verified and reflected in national management strategies by each party.</p>	<p>MARITIME: Contracting Parties should decide on national level whether to extend the requirements of the BWM Convention to domestic merchant fleets and naval vessels</p>
<p>Development of strategies for preventing fishing gear loss in the Baltic Sea by analyzing the fishing strategic context and available options for fishing gear marking</p>	<p><a href="#">Strategies for preventing fishing gear loss</a></p>	<p>Strategies for preventing gear loss should be developed and tested in the Baltic Sea region in different conditions based on the information regarding various fishing gear contexts. Fishing gear marking options, such as the one based on the radio-frequency identification system (RFID), initially tested under the MARELITT Baltic project, should be tested on a larger scale. An analysis regarding currently available systems for reporting of fishing gear loss and possible improvements should be executed and provide grounds for the development of national and regional recommendations in this respect.</p>	<p>PRESSURE: Yes            FISH: The Meeting did not endorse this action for inclusion in the BSAP but agreed that it would be appropriate in the revised RAP ML.</p>
<p>Prioritising the use of constructed wetlands to mitigate nutrient, microplastic and pharmaceutical residue leakage to the Baltic Sea and its water bodies</p>	<p><a href="#">Wetlands to mitigate nutrient, microplastic and pharmaceutical residue leakage to the Baltic Sea and its water bodies</a></p>	<p>Constructed wetlands are well known as low-tech and effective in filtering out nutrients from for example waste water and storm water. It is a natural technology that uses biodegradation, sorption, plants and sunlight to clean wastewater, among other things. Constructed wetlands have often built for the purpose of nutrients and particulate matter from the wastewater, but several studies have also shown that wetlands have the potential to remove micro particles as well as common pharmaceutical residues from the wastewater. Constructed wetlands or ponds should be the additional and prioritised measure to consider in relation to road constructions, as a final stage at WWTP, utilised in cities to catch storm water. Although space demanding, it is a low cost and highly effective way to further reduce leakage of nutrients but now also proven, to catch microparticles and pharmaceuticals before entering the water ways of the sea.</p>	<p>Proposed to move to the eutro segment with subsequent revision. Can be utilized to update HELCOM Rec on small WWTP. It helps to mitigate also pollution from diffuse sources. Also measure to increase climate change resilience. Buffer for storm waters.</p>