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<b>Document title</b>	Technical comments by Denmark to document 5-1-Rev.1
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<b>Category</b>	INF
<b>Agenda Item</b>	5 - Preparatory work for HOLAS III assessment
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## Background

This document contains technical comments by Denmark to the indicators for which threshold values/threshold value setting methodologies are presented for approval (as indicated in document 5-1-Rev.1).

The national coordination process is still ongoing in Denmark and Denmark aims to finalize the national process before Christmas or latest in early January 2022. Therefore, Denmark will take a general study reservation on all indicators for which threshold value development is presented for approval at the HOD 61-2021. Denmark has however provided technical comments, below, in order for HELCOM HODs to consider. To facilitate discussion at the meeting it is proposed that the technical comments will be incorporated in the presentations of the relevant individual indicators at HOD 61-2021.

## Action requested

The Meeting is invited to take note of the comments.

## Technical comments by Denmark to document 5-1-Rev.1

Indicator	Danish technical comments
Abundance of coastal fish key functional groups	We cannot take part in this indicator due to lack of data, but we have no technical objections to the proposed threshold value application.
Abundance of non-commercial offshore species (three-spined stickleback, flounder, brill and dab).	<p>At current, we cannot support this threshold value application, and we see a need for a discussion about this indicator and threshold value in the relevant expert group.</p> <p>Turbot, flounder, dab and brill are on the recently approved HELCOM list of commercial species (<a href="https://portal.helcom.fi/meetings/ComFish%20WS%201-2021-934/MeetingDocuments/Notes%20of%20ComFish%20WS%201-2021.pdf">https://portal.helcom.fi/meetings/ComFish%20WS%201-2021-934/MeetingDocuments/Notes%20of%20ComFish%20WS%201-2021.pdf</a>). In accordance with the ComFish decision, the indicator and threshold setting should ideally follow the guidelines for commercial species as well as existing ICES assessments of abundance and thresholds where available. The rationale for adding stickleback to the list of investigated species is not clear. This species is not considered sensitive to the major anthropogenic pressures in the Baltic Sea and is also not a commercial species. The present approach must be adapted to accommodate these shortcomings before DK will be able to approve it.</p>
Number of drowned mammals and waterbirds in fishing gear (birds)	We support to include this indicator in HOLAS III, but we cannot support setting threshold values without seeing some concrete calculations for the different species. If that is not possible in a reasonable time prior to HOLAS III the indicator must be included as a pilot assessment in HOLAS III, and the proposed approval of the threshold values must take place after HOLAS III.
Waterbird breeding success	We cannot take part in this indicator due to lack of data, but we have no technical objections to the proposed threshold value application.
Waterbird habitat quality	We do not support this as an indicator due to technical issues, but we can support to include a description of the work in HOLAS III as agreed at an intersessional meeting after State & Conservation.
Number of drowned mammals and waterbirds in fishing gear (mammals)	<p>We cannot support the inclusion of a threshold value for seals based on LRL. This is regardless of whether the assessment is on the "original" division of harbour seals or not. We find that adding this element is unnecessary and complicates the assessment. The proposed methodology for seals includes safety margins and uncertainties in population estimates, and as such we don't consider this extra step relevant.</p> <p>Regarding the proposed methodology for assessing Belt Sea population of harbour porpoise, Danish scientists recommend a threshold value set against an average of population estimates rather than using only the last mini scans estimate.</p>

Seasonal succession of dominating phytoplankton groups	DK continues to be sceptical about the structure and threshold setting of this indicator. As also agreed at S&C we can from a technical point of view support that in HOLAS III a test assessment is prepared, but that it is not to be used as a core indicator.
Diatom/Dinoflagellate index	DK has on many occasions pointed out that the causality of the indicator has not been sufficiently demonstrated, and that DK is sceptical of the indicator. We can however support the continued development and test assessments of the indicator.
Eutrophication indicators in the Bornholm basin	DK has no technical objections to the German proposal for revised threshold values for the Pomeranian Bay. However, (as also agreed by S&C) DK would not be able to support revised threshold values for the remaining part of the Bornholm basin.
Cumulative impact from physical pressures on benthic biotopes (CumI)	We do not support using this indicator beyond HOLAS III.
Metals: QS for Lead in sediment	Denmark will retain the study reservation on application of the QS value of 120 mg/kg in sediment for lead in the Danish national waters.
Metals: BAC for Lead in fish liver	Denmark will retain the study reservation on application of the OSPAR BAC value of 26 µg/kg ww for fish liver for lead in the Danish national waters.
Metals: QS for cadmium in sediment	Denmark will retain the study reservation on application of the QS value of 2.3 mg/kg in sediment for cadmium in the Danish national waters.
Polyaromatic hydrocarbons (PAH) and their metabolites: QS for anthracene in sediment	Denmark will retain the study reservation on application of the QS value of 24 µg/kg in sediment for anthracene in the Danish national waters
Distribution in time and space of loud low- and mid-frequency impulsive sounds	<p>DK supports the development of the indicator.</p> <p>It is of utter importance for DK that any thresholds await and are aligned with the work in EU TG-Noise. Therefore, DK cannot support quantitative threshold assessments, as is suggested by the ATT.30 document.</p> <p>At the State &amp; Conservation 15 meeting, it was decided to only use a quantitative assessment if thresholds were decided from EU. The notion that thresholds await and must be aligned with those being set at EU-level by TG-Noise, should be added to the proposed approach for the indicator (ATT.30 document), e.g. under "Threshold value setting logic and rational".</p> <p>DK supports a qualitative assessment of the indicator for the HOLAS III, unless a threshold has been decided upon in EU.</p>