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Agenda Item	2 – Information on the steps taken so far to develop a Regional Action Plan (RAP) on Marine Litter (ML) for the Baltic Sea and presentation of Draft 1
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Submitted by	Secretariat
Reference	Outcome of HELCOM 35/2014 (paragraph 4.34), Outcome of HOD 46-2014 (paragraph 4.1-4.7)

Background

The First HELCOM Workshop on Regional Action Plan for Marine Litter ([MARINE LITTER 1/2014](#)), agreed that the 0 draft of the HELCOM Action Plan on Marine Litter was to be prepared, based on the outcome of the workshop, by the Secretariat and Germany as Lead country. Recently, the 46th Meeting of the Heads of Delegation, supported, in principle the proposal to develop the Regional Action Plan on Marine Litter into a HELCOM Recommendation ([Outcome of HOD 46-2014](#)).

Contracting Parties were asked to provide their comments on the document for its further update and elaboration at the Second HELCOM Workshop on Regional Action Plan for Marine Litter, to be held on 22-23 October 2014 in Stralsund, Germany.

This document contains the Draft 0 of the HELCOM Action Plan on Marine Litter containing all the comments received from Contracting Parties and Observers.

Action required

The meeting is invited to take note of the information.

HELCOM ACTION PLAN ON MARINE LITTER (0 Draft)

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HELCOM ACTION PLAN ON MARINE LITTER (0 Draft)

Adopted by [XXXX]

Section I – Preamble/Introduction

NOTING the increasing evidence of harmful effects of marine litter on the marine ecosystem (e.g. entanglement of biota in marine litter, ingestion of marine litter by marine organisms, litter as potential source for accumulation of toxic substances within the marine food web and pathway for transport and introduction of alien species, damage and degradation of marine habitats due to the presence of marine litter) and people (e.g. potential introduction of toxic and hormonal effective substances in fish and shellfish consumed by humans, safety risks caused by marine litter washed ashore, risk to navigation safety at sea) as well as for economic losses to many activities (e.g. fishing, shipping, tourism, tidal power activities) and communities (costs of beach clean ups) of the Baltic Sea;

BEING AWARE that household activities (including sanitary waste), coastal-based recreational and tourism activities, transport and waste collection/dumping, fishing activities and micro-particles from land-based sources (e.g. fibres and road traffic) are the main types of activities contributing to marine litter inputs in the Baltic Sea and that the dominating-predominant type of material consists of plastics;

CONSCIOUS that marine litter is one of the eight contaminant categories of the Global Programme of Action for the Protection of the Marine Environment from Land-Based Sources (GPA) of UNEP as well as one of the key issues of the Regional Seas Programme (RSP) of UNEP;

RECALLING that with the HELCOM Baltic Sea Action Plan (2007) the Contracting Parties:

1. Encouraged projects by local governments and local communities to remove litter from the coastal and marine environment, such as beach clean-up operations, “Fishing for Litter” initiatives and local litter campaigns, noting the leading role of the voluntary sector in such activities;
2. Agreed to extend the “no-special-fee” system for ship-generated wastes in the Baltic Sea region to cover also wastes caught in fishing nets and to consider adequate incentives to encourage delivery by fishermen of such waste to onshore port reception facilities; to this end
3. Adopted the revised HELCOM Recommendation 28/1 “Application of the “no-special-fee” system to ship-generated wastes in the Baltic Sea Area” as HELCOM Recommendation 28E/10 (2007);
4. Agreed on raising public awareness of the negative environmental and economic effects of marine litter in the marine environment, including effects of “ghost fishing” of lost or discarded fishing gear;

NOTING the importance of the application of HELCOM Recommendations as a means of achieving a reduction of litter in the Baltic Sea environment:

1. HELCOM Recommendation 10/5 concerning guidelines for the establishment of adequate reception facilities in ports (1989);
2. HELCOM Recommendation 10/6 concerning the application by the Baltic Sea states if a Helsinki Convention for reporting alleged inadequacy of reception facilities for sewage (1989);
3. HELCOM Recommendation 10/7 concerning general requirements for reception of wastes (1989);
4. HELCOM Recommendation 19/14 concerning a harmonized system of fines in case a ship violates anti-pollution regulations (1998);
5. HELCOM Recommendation 19/9 (supplemented by HELCOM Recommendation 22/1) concerning the installation of garbage retention appliances and toilet retention systems and standard connections for sewage on board fishing vessels, working vessels and pleasure craft (1998);
6. HELCOM Recommendation 31E/4 concerning proper handling of waste/landfilling (2010);

Comment [A1]: Denmark appreciates that the structure and format of the HELCOM RAP is following the structure and format of the OSPAR RAP, where possible.

Comment [A2]: Can the fibres generated by tumble dryers be a problem? Could a simple thing such as throwing these fibers in the bin instead of the toilet be a small help to reduce the microparticles in the marine environment?

Comment [A3]: I feel this does not fit in the sentence, I read it as if micro-particles from land based sources is an activity.

Comment [A4]: Ship generated waste as well as microplastic (microparticles) in personal care and cosmetic products should be supplemented here.

Comment [A5]: The structure of the whole section is confusing. There should be a systematic order as regards the programmes and regulations addressed, such as 1) global, 2) European, 3) regional, [4] national], or vice versa.

Comment [A6]: global

Comment [A7]: regional

Comment [A8]: regional (very lengthy section)

Comment [A9]: Does this recommendation also concern garbage (ML)?

RECALLING the HELCOM Recommendation 29/2 concerning marine litter within the Baltic Sea Region (2008) while giving a framework for marine litter monitoring;

RECALLING that with the HELCOM Moscow Ministerial Declaration (2010) the Contracting Parties agreed to take further steps to be able to carry out national and coordinated monitoring of marine litter and identify sources of litter;

TAKING INTO ACCOUNT ~~that with~~ the HELCOM Copenhagen Ministerial Declaration (2013) ~~the Contracting Parties and its agreements and decision as regards marine litter, in particular those referring to the development of a Regional Action Plan on marine litter.:~~

Comment [A10]: This paragraph should be shortened. It is not necessary to quote lengthy paragraphs of the Declaration. A reference to the Declaration should be sufficient.

- ~~1. Determined to take further measures, initiatives or efforts needed to reach a healthy marine ecosystem supporting a prosperous Baltic Sea region, including addressing pollution of the marine environment by litter, as well as impacts on marine organisms from underwater impulsive and continuous noise;~~
- ~~2. Being Were seriously concerned about the growing evidence of harmful effects of marine litter on wildlife and habitats and on marine biodiversity and the environment with a dominance of plastics of different sizes (ranging from macro to microparticles);~~
- ~~3. Agreed Agree to prevent and reduce marine litter from land and sea based sources, causing harmful impacts on coastal and marine habitats and species, and negative impacts on various economic sectors, such as fisheries, shipping or tourism, and to this end;~~
- ~~4. Decided Decide to develop a regional action plan by 2015 at the latest with the aim of achieving a significant quantitative reduction of marine litter by 2025, compared to 2015, and to prevent harm to the coastal and marine environment;~~
- ~~5. Agreed Agree that the regional action plan on marine litter should allow to:~~
 - ~~— Carry out concrete measures for prevention and reduction of marine litter from its main sources with the aim of achieving significant quantitative reductions focusing inter alia on working with industry to reduce or phase out microbeads in certain products in the market;~~
 - ~~— Develop and test technology for removal of microplastics and nanoparticles in municipal waste water treatment plants by 2020 and inter alia work with industry to ban the use of microplastics, and on the assessment of the use of nanoparticles within the production process (e.g. in cosmetics);~~
 - ~~— Utilize existing networks to address marine litter issues;~~
 - ~~— Develop common indicators and associated targets related to quantities, composition, sources and pathway pathways of marine litter, including riverine inputs, in order to gain information on long term trends, and carry out the monitoring of the progress towards achieving the agreed goals and to gain an inventory of marine litter in the Baltic Sea as well as sound scientific sound evaluation of its sources. Where possible, the harmonized monitoring protocols based on the recommendations of the EU Technical Subgroup on Marine Litter will be used;~~
 - ~~— Identify the socio-economic and biological impacts of marine litter, also in terms of toxicity of litter;~~
 - ~~— Review regularly the effectiveness of the measures, for the first time by 2020;~~

Comment [A11]: Die zwei gelbmarkierten Sätze sind m.E. fast identisch aber im ersten Satz "reduce" und im 2. Satz "ban"! "Microbeads" sind identisch mit "microplastics (e.g. in cosmetics)"! Was nun will Helcom?

Comment [A12]: Scurrile Satz! What does this mean? Schwammige Begriffe (Utilize, Networks, Address, Issues)

RECALLING the London Convention 1972 and the 1996 Protocol thereto aiming to promote the effective control of all sources of marine pollution and to take all practicable steps to prevent pollution of the sea by dumping at sea of wastes and other matter generated on land;

RECALLING the UN Convention on the Law of the Sea and its obligations to protect and preserve the marine environment (Art 192) including to take measures to prevent, reduce and control pollution (Art 194)

RECALLING ALSO the international obligations on ship generated waste management coming from the implementation of the Annex V of the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78), ~~revised~~ to assess its effectiveness in addressing sea-based sources ~~of marine debris,~~ especially lost fishing gear;

Comment [A13]: Global

Comment [A14]: global

Comment [A15]: Latvia suggests to reconsider wording of this paragraph, as MARPOL, does not regulate collection of floating marine debris. As regards to lost fishing gear which may harm the environment, reporting is specified in the regulation 10.6 of MARPOL Annex V. Any other type of garbage is strongly regulated not to harm the environment.

RECALLING the United Nations General Assembly Resolutions on Oceans and the Law of the Sea (A/RES/60/30, 2005 and A/RES/63/111, 2008) as well as on sustainable fisheries (A/RES/60/31, 2005 and A/RES/63/112, 2006); Is there a reason why the preamble refers to the 2005 and 2008 UNGA Resolutions on Oceans and the Law of the Sea and to the 2005 and 2006 UNGA Resolutions on sustainable fisheries, instead of the ones from 2013?

Comment [A16]: global

RECALLING ALSO Rio +20 commitment to take action to achieve significant reductions in marine debris and the achievement of the goals and strategy objectives of the Honolulu strategy (A/RES/66/288, 2012);

Comment [A17]: global

BEING AWARE of the various obligations for EU Contracting Parties in HELCOM addressing the sources and in the case of the Marine Strategy Framework Directive also impacts of marine litter, precisely:

Comment [A18]: EU

Comment [A19]: The obligations stemming from the MSFD as regards marine litter should be mentioned (e. g. reference to D10)

1. Council Directive 91/271/EEC concerning urban waste water treatment;
2. European Parliament and Council Directive 94/62/EC on packaging and packaging waste.
3. Council Directive 99/31/EC on the landfill of waste;
4. Directive 2000/59/EC of the European Parliament and of the Council on Port Reception Facilities for Ship-generated Waste and Cargo Residues (EC Directive on Port Reception Facilities);
5. Directive 2008/56/EC of the European Parliament and of the Council establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive);
6. Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive);
7. Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (Birds Directive);
- 5-8. Directive 2008/98/EC of the European Parliament and of the Council on waste and repealing certain Directives (Waste Framework Directive);
9. Directive 2009/123/EC of the European Parliament and of the Council amending Directive 2005/35/EC on ship-source pollution and on the introduction of penalties for infringements;
10. COUNCIL REGULATION (EC) No 1224/2009 of 20 -November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006 (OJ L 343, 22.12.2009, p.1);

Comment [A20]: What is the benefit of just listing these Directives? Consequences for the HELCOM work?

Comment [A21]: art. 48

Comment [A22]: JH: Es kann nicht darum gehen, die rechtlichen Vorgaben in bestehenden Richtlinien zu ändern bzw. zu ergänzen. Dann müsste man die Rlen ändern. Die WRRL befasst sich beispielsweise nicht explizit mit dem Thema Müll und das Thema hat in den Diskussionen zur Umsetzung der WRRL bisher keine Rolle gespielt. Im Binnengewässerbereich fehlen auch noch einige Erkenntnisse, um belastbare Aussagen für die Bewirtschaftungsplanungen zu treffen. Die Badegewässerrichtlinie ist eine RL, die vorrangig auf mikrobiologische Verunreinigungen abstellt. Verschmutzung der Strände spielt nur ganz allgemein in Artikel 9 Abs. 2 der Badegewässer-RL eine Rolle, auch unter Nennung von Plastikmüll, aber ohne hinsichtlich der Maßnahmen spezifisch zu werden. Man sollte mit solch markigen Aussagen wie "need to include into the obligations" also zurückhalten. Das ist in der Maßnahmenliste auf S. 8, vorletzte Zeile, besser formuliert.

RECALLING the target proposed in the European Commission's Communication 'Towards a Circular economy' (COM(2014) 398) to reduce marine litter by 30 % by 2020 for the ten most common types of litter found on beaches, as well as for fishing gear found at sea , with the list adapted to each of the four marine regions in the EU;

I would also suggest to include the aspirational target formulated in the circular economy by the commission that " proposes an aspirational target of reducing marine litter by 30 % by 2020 for the ten mostcommon types of litter found on beaches, as well as for fishing gear found at sea , with the list adapted to each of the four marine regions in the EU;" <http://ec.europa.eu/transparency/regdoc/rep/1/2014/EN/1-2014-398-EN-F1-1.Pdf>

BEING ALSO AWARE of the need to include-take into account [consider] the issue of marine litter into the obligations-in the implementation of of some additional EU directives:

1. Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for Community action in the field of water policy (Water Framework Directive);
2. Directive 2006/7/EC of the European Parliament and of the Council concerning the management of bathing water quality and repealing Directive 76/160/EEC (Bathing Water Directive);
3. Directive 2005/32/EC of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for energy-using products and amending Council Directive

92/42/EEC and Directives 96/57/EC and 2000/55/EC of the European Parliament and of the Council (Ecodesign Directive).

Comment [A23]: See previous comment

Section II - General Provisions

Article 1

Definition of terms

Comment [A24]: List to be further developed based on content of the Plan.

Comment [A25]: List to be further developed based on the content of the Plan.

For the purpose of this Regional Plan:

Comment [A26]: WWF proposes to remove the definition of the "Abandoned fishing gear" as the definition is not used in the next sections of the document.

~~1. "Abandoned fishing gear" means fishing gear that is deliberately left at sea with no intention by fishers to retrieve it, for whatever reason;~~

For the consistency of the document the ALDFG definition should be used when referring to abandoned, lost or otherwise discarded nets. The ALDFG definition includes abandoned fishing gear component.

~~2.1. "ALDFG" means collective term for commercial and recreational fishing gear that has been abandoned, lost or otherwise discarded, without any intention for further control and recovery. Often referred to as "derelict fishing gear" in literature;~~

Furthermore WWF is of the opinion that the number of fishing gears that are "deliberately left at the sea" is low. Most of the fishing gear are lost

~~3.2. "Biodegradable plastics" means plastics which biodegrades to a large extent only under specific conditions of constant temperature and humidity in industrial composting installations and therefore do not biodegrade in a reasonable time when entering the marine environment as litter;~~

Comment [A27]: WWF proposes to clarify that both type of fishing gears could be classified as a ALDFG.

~~4.3. "Discarded fishing gear" means fishing gear or parts thereof that is deliberately thrown overboard or and left in the marine environment without any intention for further control or recovery;~~

~~5.4. "Fishing gear" means tools for the capture of aquatic resources. This definition includes all items/elements onboard fishing vessels that are used for fishing purposes, including fish aggregating devices (FADs).~~

~~6.5. "Ghost fishing" means the unintentional capture of marine organisms by lost, abandoned or otherwise discarded fishing gear or parts thereof;~~

~~6. "Helsinki Convention" means the Convention on the Protection of the Marine Environment of the Baltic Sea Area, 1992;~~

Comment [A28]: This definition is used only once here in the document. And since at EU level it has been decided not to define biodegradable

~~1. "IUU fishing gear" means any fishing gear, marked or not marked, used for the purpose of illegal, unreported and unregulated fishing;~~

Comment [A29]: What does further control mean here?

7. "Marine litter" means any solid material which has been deliberately discarded, or unintentionally lost on beaches and on shores or at sea, including materials transported into the marine environment from land by rivers, draining or sewage systems or wind. It includes any persistent, manufactured or processed solid material;

Comment [A30]: No. 1 and No. 4 could be merged to "abandoned or discarded fishing gear" as the difference seems to be very small

8. "Macro litter" means marine litter more than 2,5 cm in size;

9. "Meso litter" means marine litter between 5 mm and 2,5 cm in size;

10. "Microlitter" means marine litter less than 5 mm in size;

11. "Microplastics" means microscopic small plastic particles less than 5 mm in size. Further divided into "Large Microplastics", covering the size class of 1-5mm, and "Small Microplastics", smaller than 1mm;

Comment [A31]: Please refer to comments number P2

12. "Personal care product" means an article intended to be rubbed, poured, sprinkled, or sprayed on, introduced to, or otherwise applied to, the human body or any part thereof for cleansing, beautifying, promoting attractiveness, or altering the appearance and an article intended for use as a component of such an article.

Comment [A32]: Is it necessary to have such an extensive list on ALDFG?

13. "Plastic microbead" means an intentionally added a plastic particle in personal care products measuring 5 mm or less in size in every dimension intentionally added to e.g. cosmetics;

Comment [A33]: Using the word persistent (which is also used in the OSPAR definition – which I missed!!!) without defining

14. "Primary microplastics" means plastics produced in microscopic size either for the direct use in products (such as microbeads used e.g. in cosmetic peeling products) or indirect use, such as pre-productions pellets or nurdles);

Comment [A34]: Again here is a definition which has not been used later in the document. We should

15. "Secondary microplastics" means the fraction of microplastics in the marine environment which results from the breakdown of larger items in numerous tiny fragments due to mechanical forces and/or photochemical processes.

Comment [A35]: Microscopic would be smaller than 1 mm, 5 mm is huge for microscopists and visible to the naked eye

Comment [A36]: Where do the fibers released by clothing (in washing machines) fit in?

Article 2 Area of application

This Regional Plan shall apply to the whole of the Baltic Sea Area. For the purposes of this Regional Plan the "Baltic Sea Area" shall be the Baltic Sea and the entrance to the Baltic Sea bounded by the parallel of the Skaw in the Skagerrak at 57° 44.43'N. It includes the internal waters, i.e., for the purpose of this Regional Plan waters on the landward side of the base lines from which the breadth of the territorial sea is measured up to the landward limit according to the designation by the Contracting Parties.

A Contracting Party shall, at the time of the deposit of the instrument of ratification, approval or accession, inform the Depositary of the designation of its internal waters for the purposes of this Regional Plan.

Article 3 Objectives

The main objectives of the Regional Plan are to establish a range of recommended measures and actions to:

1. ~~Reduce the amount and input of marine litter to the Baltic environment by 50% by 2020 and to end up the input of marine litter to the Baltic Sea within a generation (by 2035).~~
1. ~~Prevent and significantly (?) reduce marine litter in the Baltic Sea and its impact on marine biota, habitats, public health and safety and reduce its socioeconomic costs with the aim to achieve a significant quantitative reduction of marine litter by 2025, compared to 2015, and to prevent harm to the coastal and marine environment in the Baltic Sea area;~~
2. Remove litter from the marine environment in a practical, feasible and environmentally sound manner in a close cooperation with the sea users and local communities;
3. Work coordinately to enhance knowledge/evidence on the impact of the marine litter on the Baltic ecosystem and its elements base and awareness on sources and impacts of marine litter;
- 3-4. Support Contracting Parties in the development and implementation of a regional approach that can add value to the action of individual Contracting Parties towards the development and implementation of national programmes for litter reduction also in support of the regionally coherent implementation of the Marine Strategy Framework Directive for EU Contracting Parties in HELCOM;
- 4-5. Develop management and reporting approaches regarding Contracting Parties progress and cooperation that are consistent with accepted regional and international procedures as well as commitments to the Marine Strategy Framework Directive for EU Contracting Parties in HELCOM;
- 5-6. Foster cross-sectorial cooperation and seek close cooperation with other relevant regional and global organizations and initiatives to combat marine litter, including UNEP and other Regional Seas Conventions, the International Maritime Organization, the Convention on Biological Diversity, the European Union, Fisheries Regional Advisory Councils, North East Atlantic Fisheries Commission and River and River Basin Commissions. Partnerships with the private sector and with non-governmental organizations should also be part of the working approach.

Article 4 Principles and obligations

1. In implementing the Regional Plan, the Contracting Parties shall be committed to their obligations as referred to in Article 3 and as contained in the Helsinki Convention concerning:
 - (a) The prevention and elimination of pollution from land-based sources (Article 6 of the Helsinki Convention);
 - (b) The prevention of pollution from ships (Article 8 of the Helsinki Convention);

Comment [A37]: It would be appropriate to include a map (e. g. in the Annex)

Comment [A38]: What is meant?

Comment [A39]: to be adapted according to the format of the Plan.

Comment [A40]: to be adapted according to the format of the Plan.

Comment [A41]: to be adapted according to the format of the Plan.

Comment [A42]: To be adapted according to the format of the Plan.

Comment [A43]: In WWF opinion the main aim of the Plan should be to: first of all reduce the input of new marine litter to the environment (prevention), secondly to reduce the amount of marine litter by retrieval actions and in that way reduce its impact on the Baltic ecosystem. The timeframe of the actions should be consistent with the targets and goals specified in the Marine Strategy Framework Directive.

Comment [A44]: Prevent the input of marine litter Prevent marine littering

Comment [A45]: Consistence with MSFD?

Comment [A46]: According to MSFD this should be achieved by 2020 (although probably hardly possible...). A justification for the deviation in deadlines or a respective reference would be helpful.

Comment [A47]: In WWF opinion the crucial issues are to ensure that the actions are economically viable ...

Comment [A48]: WWF proposes to specify what knowledge and evidence should be enhanced.

Comment [A49]: JH: wird ausdrücklich unterstützt

Comment [A50]: See comments above

Comment [A51]: Define what is accepted!

Comment [A52]: JH: Wird ausdrücklich unterstützt, auch die ...

Comment [A53]: This amendment refers to the obligations stemming from the MSFD. The exceptional ...

- (c) The abatement of harmful effects on the marine environment of the Baltic Sea Area caused by pleasure craft activities (Article 9 of the Helsinki Convention);
 - (d) The conservation of natural habitats and biological diversity and protection of ecological processes through the development of the appropriate measures (Article 15 of the Helsinki Convention).
2. In implementing the Regional Plan, the Contracting Parties shall be guided by the following fundamental principles, as also contained in the Helsinki Convention:
- (a) "The precautionary principle" (paragraph 2 of Article 3 of the Helsinki Convention);
 - (b) "The use of Best Environmental Practice and Best Available Technology" (paragraph 3 of Article 3 of the Helsinki Convention; paragraph 1 of Article 6 of the Helsinki Convention);
 - (c) "The polluter-pays principle" (paragraph 4 of Article 3 of the Helsinki Convention).
3. Additionally there are other approaches that should help guide interpretation and decision-making on the implementation of actions within the framework of the Action Plan. These approaches are not legal formulations, but should help frame the development of measures: The "ecosystem-based approach", as the comprehensive integrated management of human activities based on best available scientific knowledge about the ecosystem and its dynamics, in order to identify and take action on influences which are critical to the health of marine ecosystems, thereby achieving sustainable use of ecosystem goods and services and maintenance of ecosystem integrity;
- (a) "Public participation", encompassing a range of procedures and methods designed to consult, involve, and inform the public to allow those that would be potentially affected by a decision or policy to have input into the process. The latter are also known as stakeholders. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, nongovernmental organizations, the academic community, or other businesses;
 - (b) "Sustainable consumption and production", defined as the use of services and related products, which respond to basic needs and bring a better quality of life while minimizing the use of natural resources and toxic materials as well as the emissions of waste and pollutants over the life cycle of the service or product so as not to jeopardize the needs of future generations;
 - (c) "Best available knowledge and socioeconomic effectiveness";
 - (d) "Integration", by virtue of which marine litter management shall be an integral part of the national solid waste management plans, and at higher level (e.g. European or regional) if applicable;
 - (e) "Cooperation" with other relevant regional and international maritime organizations and initiatives [i.a. OSPAR Commission, Barcelona Convention, Black Sea Commission, Baltic Sea Advisory Council, International Maritime Organization, European Union.]

[Article 5
Preservation of rights]

[The provisions of this Regional Plan shall be without prejudice to stricter provisions respecting marine litter management measures contained in other national, regional or international instruments or programmes.]

Section III – Measures and operational targets [suggest that measures are divided into regional and national measures]

Comment [A54]: No! This is not up-to-date anymore! According to the MSFD the application of the ecosystem-based approach is definitely legally binding (see e. g. MSFD Art. 1 (3) and Art 3 (5)). This underlines the importance of not only referring to the Convention but also to the MSFD as well as the BSAP (the latter also includes the application of the ecosystem approach). Therefore, this paragraph is too weak as regards the ecosystem approach and needs to be revised, e. g. the ecosystem approach should be included in paragraph 2 with reference the EU-regulations (and the BSAP).

Comment [A55]: If the ecosystem-based approach is defined the other approaches and principles referred to in para. 2 should also be defined. Such definitions could also be shifted to Article 1

Comment [A56]: This is not an approach but a regular procedure – at least in the implementation of EU-Directives

Comment [A57]: JH: Das würde ich präzisieren, sonst würden mir hier die River and River Basin Commissions fehlen. Hier scheint es ja speziell um die Kooperation mit anderen Meeresinstitutionen zu gehen.

Comment [A58]: Is this necessary? At least a distinct article seems dispensable (perhaps include it in Article 4?)

Comment [A59]: Denmark appreciates that the national measures are presented as measures that the CPs should consider to implement.

Comment [A60]: May be better "transboundary" measures?

The HELCOM Action Plan on Marine Litter identifies a number of measures/actions in conformity with the objectives and principles of the Action Plan and informed by the findings of main items, materials, amounts and sources of marine litter.

Two types of measures are identified. The so-called HELCOM measures apply to a regional level with a large-scale, widespread and transboundary character. Coordination on these kinds of actions is the key aim of the HELCOM Action Plan on Marine Litter and will be followed up by an implementation plan with timelines and lead countries.

Other measures are recommended for application on a national level. Recalling the obligations in relation to regional cooperation of Article 5 of the EU's Marine Strategy Framework Directive (MSFD), HELCOM Contracting Parties which are also EU Member States should consider including the actions set out in the HELCOM Action Plan on Marine Litter in their EU Marine Strategy Framework Directive MSFD programmes of measures. HELCOM in this respect will serve as an regional coordination and an exchange platform for gaining and sharing information on technical, economic and policy aspects of such measures and the effects they have on the marine environment. Collaboration with global, regional and sub-regional organisations, to address the transboundary aspects of marine litter and facilitate regionally coordinated measures and monitoring programs should be fostered.

The Plan should include harmonised and regionally coordinated monitoring schemes for marine litter and its impact. The need to carry out research to close the knowledge gaps related to marine litter: including sources, pathways, and effects on ecosystems and organisms should be highlighted. Voluntary activities engaging the society should be promoted i.e. clean-ups and educational programmes, to increase public awareness of marine litter.

Both types of measures are divided in four themes: (i) actions to combat land-based and (ii) combat sea-based sources of marine litter; (iii) actions for the removal and disposal of existing litter from the marine environment; and (iv) actions for education and outreach on the topic of marine litter. Smarter production is treated as an integral theme.

Please note: at this stage the potential national and regional measures as identified at the respective HELCOM breakout session at the Berlin Conference in April 2013 and the First HELCOM Workshop on Regional Action Plan for Marine Litter in May 2014 are listed in joint lists. For the second workshop a broad participation of further experts from industries, NGOs, science and public authorities is envisaged which will likely lead to the determination of further measures as required and changes in the prioritizations of measures of the existing lists. Potentially this will also lead to some changes with regard to the right level of implementation (regional or national). After the second workshop the measures will be included either in the regional list or as recommended to be applied national wise.

Article 6

Addressing land-based sources of marine litter

[Measures to reduce the input of land based sources of marine litter are grouped in five categories, according to the waste hierarchy as follows: L1 - Prevention; L2 - Minimization; L3 - Reuse; L4 - Recycling; and L5 - Disposal.]

Comment [A61]: The distinction between regional and national measures seems artificial: As regards the MSFD MS should also include regional/transboundary aspects in their national marine strategies. Maybe it would be better to predominantly refer to transboundary or purely national characters of measures rather than regional and national (application) levels of measures.

Comment [A62]: By when?

Comment [A63]: It is not clear from this which if not all of the measures and targets suggested are REQUIRED by the contracting parties. The language on what obligation actually exists should be clearer.

Comment [A64]: If HELCOM would only serve as an information exchange platform, regional coherence in the implementation of the MSFD would hardly be achieved.

Comment [A65]: Regarding Art. 6 - 8: The proposed measures should be aligned with those of the MFSD PoM respectively a clear reference to national PoM should be made with the aim to achieve - to the extent possible - coherence between national PoM and the RAPs ML of HELCOM and OSPAR.

Comment [A66]: Waste Directive says that L1 and L2 are at the same level. If you can not prevent you have to minimize. Should we also put them on one level?
Also there is missing Recovery. Recycling does not cover Recovery. Recycling is one part of Recovery. The hierarchy according to the Waste Directive is as follows:
L1 - Prevention
L2 - Preparing for re-use
L3 - Recycling
L4 - Other recovery, e.g energy recovery

Comment [A67]: The meaning and purpose of the table should be better explained, e. g. what do "Priority" and the listed CPs mean, especially in connection with the level of implementation?

Comment [A68]: JH: Ansatz und die nachfolgende Tabelle werden unterstützt. Für WR 1 4 sind vor allem die unten farblich markierten Maßnahmen tatsächlich oder potentiell relevant in Bezug auf die Diskussionen in Flussgebieten. Diese

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPLEMENTATION	PRIORITY
I.	PREVENTION		
L1A	Highlight those waste management practices that impact significantly on marine litter. Engage with the industry and other authorities, at the appropriate level, in order for them to be able to develop best environmental practice, including identification of circumstances on why and how litter “escapes” into the marine environment	National	DE, PL
L1B	Include a reference to marine litter in National Waste Prevention Plans and Waste Management Plans. There could be an element in the plans highlighting the impacts of marine litter	National	EU
L1C	Develop of End of Waste criteria to divert waste into a resource (only for EU MS, following waste/resource efficiency legislation)	National	
L1D	Base urban solid waste management on reduction at source, applying the following waste hierarchy as a priority order in waste prevention and management legislation and policy: prevention, preparing for re-use, recycling, other recovery, e.g. energy recovery and environmentally sound disposal	National	DE, PL
L1E	Evaluate Identified all products and processes that include primary micro plastics and act, if appropriate, take necessary actions, to reduce their impact on the marine environment <u>including, where appropriate, the ban of use of the micro plastic in specific products.</u>	Regional	SE, DE, EU, PL
L1F	Clarification/research on the importance of sanitary waste in the upstream waste flows	Regional, national	RU
L1G	Enhance national stakeholder alliances focusing on marine litter	National	

Comment [A69]: A general comment: In the table, how and by whom has the priority, the column with country codes been set?

Comment [A70]: Priority means that all actions are mandatory to everyone but are for specific countries a very high priority? Or how to read this column?

Comment [A71]: SE hasn't yet had a national consultation on which actions that should be prioritized in a HELCOM RAP ML. It should be clarified what is meant by this column. It is not clear to me why some actions

Comment [A72]: What does that mean?

Comment [A73]: An Aspect is missing in the list L1: Management of

Comment [A74]: could we add a column to the most left of the table

Comment [A75]: This is what is written in

Comment [A76]: We think it is not a reasonable measure. Developing a

Comment [A77]: Can not be done. All that concerns microplastics, is not

Comment [A78]: Right now this action is defined very widely by “a

Comment [A79]: WWF is of the opinion that the negative impact of

Comment [A80]: Should this measure be in this Action Plan?

Comment [A81]: If this means “upstream in rivers and refers to

L1H	Encourage international environmental certification schemes to include the management and prevention of marine litter in their lists of criteria	Regional	
L1I	HELCOM Contracting Parties to seek cooperation with the river and river basin authorities in order to include impacts of litter on the marine environment <u>from rivers, taking into account their respective river basin management plans and aiming to achieve good ecological and chemical status, in line with the Water Framework Directive, when applicable in river and river basin management plans</u>	Regional, national	DE
L1J	Exchange experience on best practice to prevent litter entering into water systems and highlight these to River or River basin Commissions	Regional, national	
L1K	Evaluate areas of risk to the marine environment from microparticles, specifically primary (i.e. for manufacturing) micro plastics, including activities that use microplastics, and <u>Based on this evaluation</u> act to reduce theirthe irtheirtheir impact <u>of microparticles</u> on the marine environment	Regional, national	SE, DE, EU, PL
II. MINIMISATION			
L2A	Share best practice on waste management, e.g. on landfill bans of high caloric wastes (especially for plastics)	Regional	DE
L2B	Evaluate the potential harm caused to the marine environment by <u>items</u> such as cigarette filters/butts, balloons, shotgun wads, cotton buds and <u>bio-film</u> support media used in sewage plants. Based on this evaluation, proposals can be made on the elimination, change or adaptation requirements for these other potentially problematic items	Regional, national	FI, DE
L2C	Investigate the prevalence and impact of expanded polystyrene (EPS) in the marine environment, and engage with industry to make proposals for alternative materials and/or how to reduce its impacts	Regional, national	FI
L2D	Carry out <u>a dialogue with</u> industry dialogue aimed at highlighting the top marine litter problem items <u>with the aim to</u>	Regional, national	

Comment [A82]: Not a reasonable measure. How can we influence regionally around the Baltic Sea international environmental certification schemes and other standards? Who would make a proposal to change existing standards? HELCOM Secretariat? We do not foresee resources in Estonia to prepare this kind of documentation right now.

Comment [A83]: Can not be done. All that concerns microplastics/microparticles, is not in our estimation that significant. The scales are too different. First we should try to change the way of

Comment [A84]: This we have. We have good examples from waste

Comment [A85]: Combine with L1A?

Comment [A86]: Not doable Seems like it is a problem to certain countries for the list is very specific? But what

Comment [A87]: How have the items been selected? Should it be based on top ten litter items found

Comment [A88]: Are these commonly observed in the sea water?

Comment [A89]: Not doable Seems again like it is a problem to certain countries? We are not planning this

Comment [A90]: Why is FI here?

Comment [A91]: Should it be linked to the action below L2D?

L2E	Explore with industry the development of design improvements to assist in the reduction of negative impacts of products entering the marine environment in order to better inform industry on alternative solutions	Regional, national	FI, DE
L2F	Investigate and promote with appropriate industries the use of Best Available Technologies to develop sustainable and cost effective solutions to for reducing and preventing sewage and storm water related waste entering the marine environment, including micro particles	Regional, national	SE, DE, EU, PL
L2G	Promote Extended Producer Responsibility Strategies requiring producers, manufacturers, brand owners and first importers to be responsible for the entire life-cycle of the product with measures prioritizing the hierarchy of waste management in order to encourage companies to design products with long durability for reuse, recycling and materials reduction in weight and toxicity. Focus to be made on items frequently found in the marine environment	National	
L2H	Establishment of voluntary agreements with retailers and supermarkets to set an objective of reduction of plastic bags consumption as well as selling dry food or cleaning products in bulk and <u>in special</u> refill special and reusable containers	National	EU
L2I	Reduce the consumption of single use plastic bags and their presence in the marine environment, supported by the development of quantifiable (sub) regional targets, where appropriate, and assist in the development of relevant EU initiatives	National	EU

Comment [A92]: Declarative measure. We would not like to take this as an obligation.

Comment [A93]: If "explore with industry" then industry will be well informed on alternatives!

Comment [A94]: Combine with L2D?

Comment [A95]: SE will work with this action within the OSPAR RAP and the results from that project could also be used within HELCOM. Maybe it would be a good idea to see the results from that project before HELCOM starts up a new project. I guess this goes for a lot of the actions.

Comment [A96]: Of great interest concerning the extended producers responsibility and litter: (Annex 1 <http://ec.europa.eu/environment/waste/pdf/Annex-COM%282014%29397.pdf>) Minimum requirements for extended producer responsibility: "support litter prevention and clean-up initiatives" (paragraph 6.4)

L2J	Assess relevant instruments and incentives to reduce the use of single-use bags and other items, which impact the marine environment, including the illustration of the associated costs and environmental impacts <ul style="list-style-type: none"> Levies on single-use carrier bags Fiscal and economic instruments to promote the reduction of plastic bag consumption, in particular less than 0.0250250 mm thick Ban on single-use plastic bags or plastic bag taxes and charges (in parallel, alternatives should be developed) 	Regional, national	EU
Identify the ten most common types of litter found on beaches with a view to reducing their quantity by 30% by 2020			
L2K	Provide an overview of what product categories contain micro-beads and that are not currently covered by legislation, including a definition of plastic micro beads, areas of application and impacts on the marine environment	Regional, national	SE, DE, EU, PL
L2L	Engage with all appropriate sectors (manufacturing, retail etc.) to explore the possibility of phasing out the use of microplastic (microparticles) in personal care and cosmetic products, including the option of a voluntary agreement	National	SE, DE, EU, PL
L2M	Establish procedures and manufacturing methodologies together with plastic industry, in order to minimize the decomposition characteristics of plastic, to reduce microparticles, especially micro-plastics.	National	SE, DE, EU, PL
L2N	Promote the use of sustainable alternatives to <u>potentially problematic marine litter items, which are frequently found in the marine environment (for example plastic (I.e drinking straws, stirrers and lollipop sticks etc), cigarette filters/butts, six pack plastic ring carries, plastic cotton swabs and so on)</u>	National	FI
III. REUSE			
L3A	Implement adequate waste reducing/reusing/recycling measures in order to reduce the fraction of plastic packaging waste that goes to landfill or incineration without energy recovery	National	

Comment [A97]: There is already discussion within the EU on this action so depending on what is coming out of that discussion the action probably need to be rewritten or excluded.

Comment [A98]: L2H-J all address single use plastic bags and could easily be included in one measure " Reduce the consumption of single use plastic bags" with a number of instruments

Comment [A99]: Could this be combined with: Evaluate all products and processes that include primary micro plastics and act, if appropriate ...

Comment [A100]: Not doable. If we talk about phasing out the use of microplastics, it can not be at the ...

Comment [A101]: Not doable. ...

Comment [A102]: To minimise degradation would mean that plastic products would have an even longer ...

Comment [A103]: Not doable. Too specific. ...

Comment [A105]: This is far too detailed. Can be used as examples e.g. in L2G

Comment [A104]: This measure should be expanded or formulated more open. So it may also include th ...

Comment [A106]: It is important but the link to ML is a bite weak. I think this issue is taken care of in ...

Comment [A107]: This makes no reference to marine debris.

L3B	Establishment of Deposits, Return and Restoration System for expandable polystyrene boxes in the fishing sector	National	
IV. RECYCLING			
L4A	Encourage the development and implementation of Sustainable Procurement Policies that contribute to the promotion of recycled products and its their consumption use consumption , in particular plastics plastic , focusing on those products that have impact upon the marine environment	National	
L4B	Implement adequate waste reducing/reusing/recycling measures in order to reduce the fraction of plastic packaging waste that goes to landfill or incineration without energy recovery	National	
L4C	Harmonization of deposit refund systems for bottles (plastics and glass) Establishment of Deposits, Return and Restoration System for beverage packaging prioritizing when possible their recycling	Regional, national	FI
L4D	Promoting the use of cardboard or other compostable materials instead of six pack plastic ring carriers	National	
L4E	Replace the plastic cotton swabs with paper/carton	National	
V. DISPOSAL			
L5A	Identify illegal and historic coastal landfill or dumpsites, including where these might be at risk from coastal erosion, and take action if appropriate	National	SE, PL
L5B	Close As far as possible Close to the extent possible the existing illegal dump sites on land in the area of the application of the Regional Plan	National	EU, PL
L5C	Take necessary measures to establish as appropriate adequate urban sewer, wastewater treatment plants, and waste management systems to prevent run-off and riverine inputs of litter	National	

Comment [A108]: Because we do not have an analysis about the problem products which end up in the sea, it would not be reasonable to support this kind of a measure at this moment.

Comment [A109]: Is it likely that this action will have an effect on what we actually find in the marine environment? Otherwise remove.

Comment [A110]: It is already ...

Comment [A111]: Beschaffen, ...

Comment [A112]: It is important ...

Comment [A113]: This makes no ...

Comment [A114]: Analysis ...

Comment [A115]: and cans?

Comment [A116]: Including ...

Comment [A117]: In Estonia we ...

Comment [A118]: Integrable in ...

Comment [A119]: this could as w ...

Comment [A120]: Too detailed. N ...

Comment [A121]: Integrable in ...

Comment [A122]: same commen ...

Comment [A123]: Missing in ...

Comment [A124]: This is not a ...

Comment [A125]: why is there th ...

Comment [A126]: If they are illeg ...

Comment [A127]: If known dump ...

L5D	Compulsory Promote beach cleaning by local communities, organised groups of volunteers and/or private companies (i.e. of the tourism sector); or incentives for beach cleaning (e.g. awards, like the "Blue flag award. Street cleansing in coastal urban cities/river are perhaps even more important	National	
L5E	Establish an exchange platform for spreading experiences on good cleaning practices in beaches, riverbanks, pelagic and surface sea areas, ports, marinas and inland waterways, urban areas. Develop best practice on environmental friendly technologies and methods for cleaning	Regional, National	DE
L5F	Develop sub regional or regional maps of accumulations/hotspots of floating coastal litter, based on mapping of circulation of floating masses of marine litter, and identification of hotspots of accumulation on coastal areas and the role of prevailing currents and winds	Regional	
L5G	Measures for removing river litter		

General comment: What reasons do we have to highlight certain specific products such as cotton bud sticks, six pack, plastic bags, cigarettes etc (but not lids, caps, candy wrappers etc). If we decide to highlight such specific products they should 1) be used as examples or 2) we have to motivate why we highlight these products.

Article 7

Addressing sea-based sources of marine litter

[Measures to reduce the input of marine litter from sea based sources of marine litter and the amount of marine litter are grouped in five categories, according to their initial prioritization: S1- Measures to enforce existing marine litter regulations; S2 - Measures to reduce impacts from ALDFG (Abandoned, Lost or otherwise Discarded Fishing Gear); S3 – Measures on port reception facilities and the application of the no-special-fee system; S4 – Measures on fishing for litter initiatives; and S5 - Measures on pleasure boating.]

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPLEMENTATION	PRIORITY
I. MEASURES TO ENFORCE EXISTING MARINE LITTER REGULATIONS			
S1A	Ensure the full implementation of HELCOM Convention Article 8 especially Regulation 6; Mandatory discharge of all wastes to port reception facilities, including implementation with regards to smaller ship types like fishing vessels.	Regional	ALL

Comment [A128]: Can not be as a mandatory measure. We can support volunteer activities and these are done right now in Estonia. Proposal to change wording into softer by using the word promote.

Comment [A129]: WWF suggests to add "organised group of volunteers" as one of possible groups to be involved in beach cleaning.

Comment [A130]: We support exchanging best practices but we hesitate should we develop a separate system for that.

Comment [A131]: Which kind of measures are meant here? Specific or any?

Comment [A132]: Which ones?

Comment [A133]: to be developed?

Comment [A134]: This is still very vague?

Comment [A135]: Denmark has the following remark: It is important to

Comment [A136]: See category referring to F4L

Comment [A137]: BSH: If "Marine Litter" as defined in Article 1 No. 8 if

Comment [A138]: BSH: With respect to Article 3, especially No. 1

Comment [A139]: BSH: Mandatory discharge to prfs in due consideratid

S1B	Fully implement <u>and enforce</u> MARPOL Annex V including identifying best practices in relation to inspections for MARPOL Annex V ship generated waste, including better management of reporting <u>[data]</u> , taking into consideration the Paris MOU on port state <u>control</u> / <u>[recommend the Paris MOU to do it]</u>	Regional	ALL
II. MEASURES TO REDUCE IMPACTS FROM ALDFG (Abandoned, Lost or otherwise Discarded Fishing Gear) MEASURES TO REDUCE IMPACTS FROM ALDFG ((MEASURES TO REDUCE IMPACTS FROM ALDFG (Abandoned, Lost or otherwise Discarded Fishing Gear)			
S2A	Through a multinational <u>projectsproject</u> , together with the fishing industry, <u>and</u> competent authorities <u>and non-governmental organizations</u> , develop and promote best practice in relation to <u>marine litterALDFG</u> . All relevant aspects (including e.g., <u>reporting on accidental loss or discharge of fishing gear under MARPOL</u> , <u>mapping hotspots</u> , <u>dolly rope</u> , waste management on board, waste management at harbours and operational losses/net cuttings) should be included	Regional	SE, PL, ES, DE
Assessment			
S2B	Develop a risk assessment <u>tool that could be used</u> for identifying where accumulations of ghost nets pose a threat to the environment and should be removed	National	All
<u>Assess fishing gear found at sea, with a view to reducing them by 30% by 2020</u>			
S2C	Identify hot spot areas <u>with special emphasis on shipwrecks and underwater constructions laid on the sea bottom</u> through mapping of snagging sites or historic dumping grounds working with other initiatives, research programmes and with fishing organisations	Regional	SE, PL, ES
S2D	Investigate the prevalence and impact of dolly ropes (bunches of polyethylene threads used to protect the cod end of demersal trawl nets from abrasions; synthetic fibre)		
S2E	Identify the options to address key waste items from the fishing industry and aquaculture, which <u>could</u> contribute to marine litter, including deposit schemes and extended producer responsibility. Project application on all the different options of waste recovery and reuse (down the waste hierarchy)	Regional, national	

Keep Sweden Tidy experience that we have a serious situation of marine litter in marinas (used as dumped sites in combination with general littering on land in the marina – that ends up in the water and sinks to the sea-bed).

Comment [A140]: It could be specified which data and what kind of reporting..

Comment [A141]: Ship inspections are already carried out in accordance with Paris MoU. To consider deletion of this part of the sentence?

Comment [A142]: WWF highlighted that the measures included in the Annex V of the MARPOL convention should be fully implemented and enforced in all Baltic countries.

Comment [A147]: SE will work with this action within the OSPAR RAP and the results from that project could also be used within HELCOM. Maybe it would be a good idea to see the ...

Comment [A143]: Reporting is required by the regulation 10.6 of ...

Comment [A144]: This is another action see S2C

Comment [A145]: This is another action see S2D

Comment [A146]: WWF is of the opinion, that non-governmental ...

Comment [A148]: At the moment the current wording is not the be ...

Comment [A150]: shipping routes and areas of military highest activity ...

Comment [A149]: how does this differ from S2B? maybe they can be ...

Comment [A151]: Maybe we should not define this in so detail ...

Comment [A152]: This measure is a general one, we propose to move th ...

General comment for chapter 7: Could also follow the same structure as for land based sources ie the waste hierarchy

Prevention & minimization			
S2F	Elaborate guidelines on best practices to reduce the input of ALDFG (abandoned, lost and otherwise discarded fishing gear) to the marine environment; utilize UNEP RSC report on ALDFG as a starting point and focus on regional specifics	Regional	All
S2G	Explore and implement <u>the</u> “Gear marking to indicate ownership” concept and <u>the</u> “reduced ghost catches through the use of environmental neutral upon degradation of nets, pots and traps concept concept concept concept ”, in consultation with the competent international and regional organizations in the fishing sector	Regional, national	All
Removal & disposal			
S2H	Investigate markets for plastic waste from the fishing and shipping industry (e.g. by bringing together producers of waste and recycling companies) by looking at specific items and differences in materials, including giving value to waste streams by financial incentives	Regional, national	
S2I	Based on the risk assessment and identification of hot spot areas initiate removal of ghost nets and their further safe disposal <u>on land</u>	Regional, national	All
III. MEASURES ON PORT RECEPTION FACILITIES (PRFs) AND THE APPLICATION OF THE NO-SPECIAL-FEE SYSTEM			
S3B	<u>Support further regional discussion within the HELCOM MARITIME as well as the HELCOM Cooperation platform on PRFs regarding the implementation of MARPOL Annex V and, for those HELCOM Contracting parties which are also EU member states, Directive 2000/59/EC in the Baltic Sea Area</u>	Regional, national	
S3C	<u>HELCOM Contracting parties which are also EU member states to support EU in the revision of the PRFs Directive (Directive 2000/59/EC)</u>	Regional	SE
S3A	Further work on <u>implementation and</u> harmonization of the no-special-fee system (addressing as possible <ul style="list-style-type: none"> – gaps in existing regulations, – enforcement and practices concerned shipping, – port reception facilities auditing to assess adequacy of garbage collection, <u>strive for</u> – fair waste burden sharing between ports). 	Regional	DE

Comment [A153]: gear marking is already compulsory

Comment [A154]: Could we and should we combine this S2I with S2B and 2SC, for they are talking about the same thing and would form one whole then?

Comment [A155]: I would move this right after S2D

Comment [A156]: This measure need additional national funding. And we can not guarantee funding at this moment. Should we leave these in the Action Plan or rephrase somehow differently for countries decision makers to decide?

Comment [A157]: S3a – In general SE supports a harmonised NSF, but wonder what “strive for fair waste burden” mean. SE thinks that this can be a goal to strive for, but do not think it is ready to become a part of an agreed actionplan yet. It is a national responsibility to control that the ports receive the garbage in accordance to the law. It is the harmonisation of the interpretation that needs to be carried out on a regional basis.

Comment [A158]: What is meant?

Comment [A159]: WWF highlights that the non-special-fee system has not been implemented in all Baltic countries. Therefore actions aimed at implementation of the system in remaining countries are needed.

S3B	Support further regional discussion within the HELCOM MARITIME as well as the HELCOM Cooperation platform on PRFs regarding the implementation of MARPOL Annex V and, for those HELCOM Contracting parties which are also EU member states, Directive 2000/59/EC in the Baltic Sea Area	Regional, national	
S3C	HELCOM Contracting parties which are also EU member states to support EU in the revision review of the PRFs Directive (Directive 2000/59/EC)	Regional	SE
S3D	Ensure the full implementation of HELCOM Recommendation 28E/10: Application of the no-special-fee system to ship-generated wastes and marine litter caught in fishing nets in the Baltic Sea area	Regional, national	All
S3E	Improve implementation of the ISO standard (ISO 201070:2013) in relation to port reception facilities	National	
S3F	Encourage submission of updated data on PRFs to IMO GISIS (Global Integrated Shipping Information System) and HELCOM	National	
IV. MEASURES ON FISHING FOR LITTER INITIATIVES			
S4A	Explore, implement and recommend the “Fishing for Litter” environmentally sound practices, in consultation with the competent international and regional organizations (i.a. KIMO Baltic Sea, OSPAR Commission), to facilitate clean up of the floating litter and the seabed from marine litter caught incidentally and/or generated by fishing vessels in their regular activities including ALDFG derelict fishing gears	Regional, national	
S4B	Identify and remove barriers to the processing or landfilling of marine litter collected in Fishing for Litter initiatives	Regional	
S4C	Encourage all fishing vessels to be involved in Fishing for Litter schemes, where they are available	National	
V. MEASURES ON PLEASURE BOATING			
S5A	Promotion of garbage collection for pleasure crafts by marinas (i.a. Blue Marinas concept associated to the availability of pump-out stations and sustainable waste management)	Regional	
S5B	Development of instruments to prevent the disposal of old pleasure boats	National	SE

Comment [A160]: S3B – SE do not support that the Helcom Cooperation Platform is used to conduct work concerning Annex V, therefore SE suggests that the action is rewritten.

Comment [A161]: As used for the first time the abbreviation should be explained.

Comment [A162]: S3C – SE suggest that this action is removed from the actionplan since it is a usual procedure when a directive is reviewed that all countries participate. SE will not offer to take lead in this action, but can offer to write a letter, even though it is a part of Ospar RAP ML.

Comment [A163]: S3E – What is meant by “improve implementation”? Does it mean that it should be implemented within national regulations or does it mean to

Comment [A164]: BSH: Compare MEPC1./Circ.671/Rev.1: ISO 21070:2011

Comment [A165]: S3F – What does it mean that the information will be submitted to HELCOM.

Comment [A166]: The writing of this action is difficult to understand. Is it only ML that is generated by

Comment [A167]: DK: the text indicates that only fishing vessels are generating the litter. We would prefer

Comment [A168]: What does this mean?

Comment [A169]: S4A, S4B can be implemented in Estonia. But again

Article 8

Addressing removal and disposal of existing marine litter

Article 9

Addressing education and outreach on marine litter

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPLEMENTATION	PRIORITY
I. EDUCATION TO TARGET GROUPS ON MARINE LITTER IMPACTS AND IMPORTANCE OF AVOIDING LITTERING (TOURISM/RECREATIONAL HOTSPOTS; PRIVATE SECTOR AND MUNICIPALITIES INVOLVEMENT) AND INNOVATIVE APPROACHES TO KEEP LOCALITIES CLEAN, LIKE NATIONAL LITTER PICKING-DAYS OF "KEEP SWEDEN TIDY" AND BIG CLEANUP DAY IN LATVIA AND LITHUANIA			
E1A	Develop marine litter assessment sheets on the development of material for education programmes, including those for professional seafarers and fishermen		
E1B	Promote and undertake education activities in synergy with existing initiatives in the field of sustainable development and in partnership with civil society <u>society and organized groups of volunteers</u> (including activities related to prevention and promotion of sustainable consumption and production)		
E1C	Promote curricula for marine related education, including the recreational sector (e.g. diving and sailing schools), which develop awareness, understanding, and respect for the marine environment and secure commitment to responsible behavior at personal, local, national and global level		
E1D	HELCOM Contracting Parties to provide information on marine litter activities to be made available through the HELCOM portal. Promote the cooperation with other institutions on this activities (e.g. OSPAR Commission)	Regional, national	

Comment [A170]: To be further elaborated from the land-based and sea-based measures those focused on removal and disposal.

Comment [A171]: To be further elaborated from the land-based and sea-based measures those focused on removal and disposal.

Comment [A172]: To be further elaborated from the land-based and sea-based measures those focused on removal and disposal.

Comment [A173]: A proposal to add here internationally known Estonian "Let's do it" campagne (<http://www.teemeara.ee/en>)?

Comment [A174]: Not doable.

Comment [A175]: What are marine assessment sheets and how can they be used to develop material for education programmes? Why not simply: "Develop material for education programmes, especially for professional seafarers including ..."

Comment [A176]: WWF suggests to add "organised group of volunteers" as one of possible groups to be involved.

II. OUTREACH/AWARENESS RAISING ON MARINE LITTER IMPACTS AND IMPORTANCE OF AVOIDING LITTERING (TOURISM/RECREATIONAL HOTSPOTS; PRIVATE SECTOR AND MUNICIPALITIES INVOLVEMENT) AND INNOVATIVE APPROACHES TO KEEP LOCALITIES CLEAN, LIKE NATIONAL LITTER PICKING DAYS OF "KEEP SWEDEN TIDY" AND BIG CLEANUP DAY IN LATVIA AND LITHUANIA			
E2A	Develop a communication strategy on the RAP linked in a coherent way with national initiatives/measures. This will include linking the HELCOM website to relevant projects and initiatives		
E2B	Encourage participation in International, EU and National Marine Litter Cleanup Campaigns		
E2C	Promote the "Adopt a beach" system		
E2D	Raising public awareness on the occurrence, impact and prevention of marine litter, including micro plasties <u>plastics particles</u>		
E2E	Developing collective agreements between HELCOM Contracting Parties, NGO's and industry to tackle particular problems of marine litter	Regional, national	
E2F	Engaging with global marine initiatives such as: <ul style="list-style-type: none"> – The UNEP's Global Programme of Action for the Protection of the Marine Environment from Land-based Activities (GPA-Marine); – Regional Seas Action Plans; – The Global Partnership on Marine Litter (GPML); – The Global Partnership on Waste Management (GPWM); and The Honolulu Commitment and the Honolulu Strategy on marine debris		
E2G	Supporting campaigns to engage the public before introducing legal and economic measures to produce behavioral change		

Comment [A177]: Redundant? See point I. above.

General comment for chapter 9: We lost the most important educational sector – schools and children and youth!

Section IV – Monitoring and Assessment

1. Monitoring data for regular assessment of the state of marine litter in the HELCOM area and evaluation of the extent to which implemented measures are being effective, and consideration of a need for action and evaluation of the degree of implementation of jointly agreed measures to be conducted according to the HELCOM Monitoring and Assessment Strategy (2013), specifically:
 - (a) Marine litter Monitoring and Assessment to be carried out **in six-year monitoring and assessment cycles** (paragraph 3.2 of the HELCOM Monitoring and Assessment Strategy, 2013);
 - (b) The monitoring system to consist of manageable components to enable assessment of quantities and properties of marine litter **in the Baltic sea marine environment, including biota, the seafloor, the water column and beaches** (paragraph 2.4.h of Attachment 2 of the HELCOM Monitoring and Assessment Strategy, 2013), as well as **introduction of marine litter** (paragraph 2.5.i of Attachment 2 of the HELCOM Monitoring and Assessment Strategy, 2013);
2. **By mid-2015** common indicators and associated targets related to quantities, composition, sources and pathway of marine litter, including riverine inputs, in order to gain information on long-term trends will be **developed**;
3. **By the end of 2014** coordinated monitoring protocols will **be** developed for some indicators, e.g. beach litter, based on the recommendations of the EU Technical Subgroup on Marine Litter.
4. By **2015** coordinated monitoring programmes on marine litter for some indicators, e.g. beach litter, will be developed.

Section V – Reporting

1. HELCOM Contracting Parties should report regularly against their implementation of measures set out in the Regional Action Plan [every year for the regional measures/every second year for the national measures] upon its entry into force, using the format in Annex I.
2. HELCOM Contracting Parties should report regularly against the effectiveness of the implemented measures **every sixth year, starting in 2020**, using the format in Annex II.

Section VI – Timetable for implementation

HELCOM Contracting Parties shall implement this Regional Action Plan according to the timelines indicated in its respective Articles.

Comment [A178]: does this mean that an assessment is made after 6 years, or that we monitor every 6th year?

Comment [A179]: Input of marine litter into the Baltic Sea? Does this refer to identification of pathways of introduction to the marine environment or to the amount and properties entering the marine environment from different pathways? The latter could be quite difficult and expensive! See also next bullet (2)

Comment [A180]: Will we really be ready then?

Comment [A181]: Who will do that? Probably not part of CORESET II? And can indicator and target development for all these items really be completed within the next 11 months? Time frame sounds a bit too ambitious

Comment [A182]: Maybe spring 2015, when the first beach litter monitoring could take place) if all countries are to use harmonized methods)

Comment [A183]: Consider that “Guidelines on sampling and reporting of marine litter found on beach” are provided in HELCOM Recommendation 29/2, since it may need to be amended.

Comment [A184]: Consider that “Guidelines on sampling and reporting of marine litter found on beach” are provided in HELCOM Recommendation 29/2, since it may need to be amended.

Comment [A185]: Consider that “Guidelines on sampling and reporting of marine litter found on beach” are provided in HELCOM ...

Comment [A186]: start/mid/end?

Comment [A187]: If we do not have data on baseline, then on what basis will we report on? ...

Comment [A188]: Reporting should be streamlined with reporting under MSFD.

Comment [A189]: Reporting every sixth year, starting in 2020. The aim is a reduction of marine litter by 2025 ...

Annex I – Reporting format on implemented measures

Latvia suggests to consider use of terms in this Annex I, as well in Annex II, e.g., Food waste, Plastic bags (is this included also under Plastic waste?) to avoid confusion between different types of wastes mentioned here and the MARPOL Annex V category B waste. E.g., use „Other plastic waste” instead of „Plastic waste”.

Country	
Date	
Contact person	
Affiliation	
E-mail	
Telephone	
Skype	
Type of measure¹	
Code of measure²	
Measure	
Implementation period	From: To:
Status	
Description of the measure	
Responsible organization	
Other organizations involved	
Geographical area covered	
URL to the initiative	

¹Please select accordingly: L –measures addressing land-based sources of marine litter; S –measures addressing sea-based sources of marine litter; R – measures addressing removal and disposal of existing marine litter; E – measures addressing education and outreach on marine litter.

²If the measure is listed in the Action Plan, please provide its code. Otherwise, leave the space in blank.

Type of marine litter targeted ³	
Compartment targeted ⁴	
Source targeted ⁵	

Comment [A190]: The use of food waste as a key word for food related packaging and utensils is not very clever as food waste (i.e. food remains) is also covered by MARPOL as a type of waste

³Select from the following keywords, the best that adjust to the types of marine litter targeted by the measure. If none is appropriate please indicate "other" and provide further details:

Keyword	Description
ALDFG	Abandoned, lost or otherwise discarded fishing gear
Food waste	Food and beverage related waste, i.a. plastic and glass bottles, "six-pack" rings, plastic caps/lids, disposable cutlery and cups, straws
Plastic bags	Single use plastic bags and shopping bags
Plastic waste	All type of plastic waste. Indicate as appropriate: macro-, meso-, micro-plastics or plastic microbeads
Sanitary waste	Household sanitary waste, i.a. sanitary pads and/or tampons, diapers, razors, cotton bud sticks
Smoking related waste	Disposable lighters, cigar tips, cigarette butts

³Please select accordingly: beach, water column, water surface, sea bed, tidal flat, river bank, shipwreck, sediment, biota.

⁴Please indicate which land-based or sea-based source of marine litter is addressed by the measure.

Annex II – Reporting format on the effectiveness of the implemented measures

Country	
Date	
Contact person	
Affiliation	
E-mail	
Telephone	
Skype	
Type of measure⁶	
Code of measure⁷	
Measure	
Implementation period	From: To:
Status	
Description of the measure	
Responsible organization	
Other organizations involved	
Geographical area covered	
URL to the initiative	

⁶Please select accordingly: L –measures addressing land-based sources of marine litter; S –measures addressing sea-based sources of marine litter; R – measures addressing removal and disposal of existing marine litter; E – measures addressing education and outreach on marine litter.

⁷ If the measure is listed in the Action Plan, please provide its code. Otherwise, leave the space in blank.

Type of marine litter targeted ⁸	
Compartment targeted ⁹	
Source targeted ¹⁰	
Cost of the initiative	
Financing source	
Challenges ¹¹	
Results achieved	
Results expected	
Negative impacts	
Next steps	
Comments	

⁸ Select from the following keywords, the best that adjust to the types of marine litter targeted by the measure. If none is appropriate please indicate "other" and provide further details:

Keyword	Description
ALDFG	Abandoned, lost or otherwise discarded fishing gear
Food waste	Food and beverage related waste, i.a. plastic and glass bottles, "six-pack" rings, plastic caps/lids, disposable cutlery and cups, straws
Plastic bags	Single use plastic bags and shopping bags
Plastic waste	All type of plastic waste. Indicate as appropriate: macro-, meso-, micro-plastics or plastic microbeads
Sanitary waste	Household sanitary waste, i.a. sanitary pads and/or tampons, diapers, razors, cotton bud sticks
Smoking related waste	Disposable lighters, cigar tips, cigarette butts

⁹ Please select accordingly: beach, water column, water surface, sea bed, tidal flat, river bank, shipwreck, sediment, biota.

¹⁰ Please indicate which land-based or sea-based source of marine litter is addressed by the measure.

¹¹ Please provide a brief description of the challenges encountered: technical, logistical, political, financial, institutional and cultural if appropriate.