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### 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 1 draft of the HELCOM Action Plan on Marine Litter, which aims to incorporate the comments received on the 0 draft, but those on Section III (Measures and Operational Targets) which are addressed on a separate document to the workshop (doc. 4-1).

### Action required

The meeting is invited to take note of the information for further discussion in the workshop.

# HELCOM REGIONAL ACTION PLAN ON MARINE LITTER (RAP ML) (DRAFT 1)

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# HELCOM REGIONAL ACTION PLAN ON MARINE LITTER (RAP ML)

## (Draft 1)

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 CONVINCED** about the severity of the problem while taking into account that more evidence is needed to adequately reflect about the scale of the problem in the Baltic Sea;

**BEING AWARE** that the main activities contributing to marine litter inputs in the Baltic Sea are household activities (including sanitary waste washed into the sea e.g. by rivers), 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 and rubber wear);

**RECOGNIZING** that other sources such as ship generated waste or primary micro particles e.g. from cosmetic products, which partly pass sewage treatment plants are of concern as well;

**RECALLING** the United Nation 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** the United Nations General Assembly Resolutions on Oceans and the Law of the Sea (A/RES/60/30, 2005; A/RES/63/111, 2008 and A/RES/68/70, 2013) as well as on sustainable fisheries (A/RES/60/31, 2005; A/RES/63/112, 2006, and A/RES/68/71, 2013);

**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);

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

**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 proper application of existing HELCOM Recommendations in order to continuously achieve reductions of litter input in the Baltic Sea environment, especially:

1. HELCOM Recommendation 10/5 concerning guidelines for the establishment of adequate reception facilities in ports (1989);
2. HELCOM Recommendation 10/7 concerning general requirements for reception of wastes (1989);
3. HELCOM Recommendation 19/14 concerning a harmonized system of fines in case a ship violates anti-pollution regulations (1998);
4. 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);
5. HELCOM Recommendation 31E/4 concerning proper handling of waste/landfilling (2010);

**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** the HELCOM Copenhagen Ministerial Declaration (2013) and in particular its Memorandum of Understanding to take further action to address the pollution of the marine environment by litter, the agreement on prevention and reduction of marine litter from land- and sea-based sources and the decision to develop a Regional Action Plan on marine litter by 2015 in order to achieve a significant reduction of marine litter by 2025, compared to 2015, and to prevent harm to the coastal and marine environment;

**BEING AWARE** of 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;

**SUPPORTING** to ensure, that considerations related to marine litter and actions in this plan are integrated as appropriate, into the implementation and any further revision of EU Directives and Regulations (e.g. Waste Framework Directive, Packaging and Packaging Waste Directive, Port Reception Facilities Directive, Landfill Directive, Water Framework Directive, Bathing Water Directive, Urban Wastewater Treatment Directive, Ecodesign Directive, Common Fisheries Policy Regulation);

**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;

## Section II - General Provisions

### Article 1

#### Definition of terms

**Comment [A1]:** List to be further developed based on the content of the Plan.

For the purpose of this Regional Plan:

1. "ALDFG" or "Derelict fishing gear" are the collective terms for commercial and recreational fishing gear that has been abandoned, lost or otherwise discarded into the marine environment where it continues to fish, a process which is often referred to as "ghost fishing";
2. "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, River and River Basin Commissions etc.];
3. "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); "Ghost fishing" means the unintentional capture of marine organisms by lost, abandoned or otherwise discarded fishing gear or parts thereof;
4. "Ghost fishing" means the unintentional capture of aquatic resources. This definition includes all items/elements onboard fishing vessels that are used for fishing purposes, including fish aggregating devices (FADs);
5. "Helsinki Convention" means the Convention on the Protection of the Marine Environment of the Baltic Sea Area, 1992;
6. "Integration", means marine litter management as an integral part of the national solid waste management plans, and at higher level (e.g. European or regional) if applicable;
7. "IUU fishing gear" means any fishing gear, marked or not marked, used for the purpose of illegal, unreported and unregulated fishing;
8. "Marine litter" means any persistent, manufactured or processed solid material discarded, disposed of or abandoned in the marine and coastal environment. Marine litter consists of items that have been made or used by people and deliberately discarded or unintentionally lost into the sea and on beaches including such materials transported into the marine environment from land by rivers, draining or sewage systems or winds. For example, marine litter consists of: plastics, wood, metals, glass, rubber, clothing, paper etc. This definition does not include semi-solid remains of for example mineral and vegetable oils, paraffin and chemicals that sometimes litter sea and shores;
9. "Macro litter" means the fraction of marine litter of more than 2,5 cm in size;
10. "Meso litter" means the fraction of marine litter between 5 mm and 2,5 cm in size;
11. "Micro litter" means the fraction of marine litter of less than 5 mm in size with a further division into "Large Micro Particles" (1-5mm) and "Small Micro Particles" (<1mm);
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.
13. "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);
14. "Public participation", means 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;

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., as well as from other degradation sources such as fibres in wastewater from washing clothes and particles of rubber lost from tyres due to normal wear;
16. "Sustainable consumption and production", means 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;

## 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, according to the format the RAP ML will take, inform the Depository 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. Prevent further introduction and reduce marine litter already present in the marine environment from land-based and sea-based sources 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 as stated in HELCOM Ministerial Declaration 2013;
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 base and awareness on sources and impacts of marine litter on the Baltic ecosystem and its elements;
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 programs for litter reduction also in support of the regionally coherent implementation of the Marine Strategy Framework Directive for EU Contracting Parties in HELCOM;
5. Support Contracting Parties in the implementation of the HELCOM Baltic Sea Action Plan (2007);
6. Develop management and reporting approaches regarding Contracting Parties progress and cooperation that are consistent with regional and international procedures as well as commitments to the Marine Strategy Framework Directive for EU Contracting Parties in HELCOM;
7. 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);
  - (c) The abatement of harmful effects on the marine environment of the Baltic Sea Area caused by pleasure craft activities through special measures, inter alia adequate reception facilities for wastes from pleasure craft (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. In implementing the Regional Plan, the Contracting Parties shall also be guided by the ecosystem approach to the management of human activities (2003 Joint HELCOM and OSPAR Ministerial Statement on the Ecosystem Approach to the Management of Human Activities), which is also a main element of the Marine Strategy Framework Directive and the Russian Maritime Doctrine.
4. 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:
  - (a) "Ecosystem Approach";
  - (b) "Public participation and stakeholder involvement";
  - (c) "Sustainable consumption and production";
  - (d) "Best available knowledge and socioeconomic effectiveness";
  - (e) "Integration";

## Section III – Measures and operational targets

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. One type of measures is best implemented at regional level following a joint approach with a large-scale, widespread and transboundary character. These include also measures which fulfill the need for the development of joined proposals and agreements of concerted actions of CPs required to achieve GES but are in the competence of the EU or other international authorities (such as IMO). This type of measures is central for the RAP ML and will be underlined with a detailed implementation plan with timelines and lead countries.

The other type of measures aims for information exchange and coordination of measures which are primarily of national concern and responsibility of CPs and are presented in the format of a check list. 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 MSFD programs of measures. HELCOM in this respect will serve as a regional coordination and 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 organizations, to address the transboundary aspects of marine litter and facilitate regionally coordinated measures and monitoring programs should be fostered.

Both types of measures are divided in four themes: (i) actions to combat land-based and (ii) 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.

### General comments from EE:

- Since we have not analysed the scope of the problem of marine litter in the Baltic Sea, we must be very general with our measure setting and rather focus on how to analyse the current situation, to have different projects looking into the severity of the issue and then we can set appropriate measures.
- Right now there are some measures / actions in the document very detailed (i.e.L4E, too detailed?) and then there are very overall and with great interpretation possibility points in here (i.e. L1J etc). And then there are some actions with too big of a scope (i.e. L1E, where one should assess all products), this might make there implementation impossible.
- Very many actions in the Plan cover such settings which are by their content for production, for marketing, for taxation (i.e. to ban plastic lollypop marketing, to limit the use of plastic bags or how to put tax on their usage etc.). These are probably currently analysed and regulated at EU level and by other international organizations. This should be mentioned in this Action Plan next to each such measure/action by adding a separate column where this connection is explained. This new column

would help decision makers to see clearly what is currently already done and which measures are new and also need additional funding.

- For we do not know how much is it possible to influence product production and marketing and taxes in different countries, we should aim for the wording of proposed measures to be more flexible and more as recommendations not as mandatory and must be way. In that way country can analyse and decide which concrete actions and measures are most suitable and most effective in its own country. And how much funding is in place for those measures to be implemented.

## Article 5

### 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 [A2]:** –EE: Right now there are some measures / actions in the document very detailed (i.e.L4E, too detailed?) and then there are very overall and with great interpretation possibility points in here (i.e. L1J etc). And then there are some actions with too big of a scope (i.e. L1E, where one should assess all products), this might make their implementation impossible.

–Very many actions in the Plan cover such settings which are by their content for production, for marketing, for taxation (i.e. to ban plastic lollypop marketing, to limit the use of plastic bags or how to ...

**Comment [A3]:** 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 ...

**Comment [A4]:** 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 [A5]:** Waste Directive sais 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: ...

**Comment [A6]:** 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 [A7]:** JH: Ansatz und die nachfolgende Tabelle werden unterstützt. Für WR I 4 sind vor allem die unten farblich markierten Maßnahmen tatsächlich oder potentiell relevant in Bezug auf die Diskussionen in Flussgebieten. Diese sind derzeit auch zutreffend formuliert.

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	<del>Evaluate</del> <del>Identified</del> all products and processes that include primary micro plastics and <del>act, if appropriate, take necessary actions,</del> to reduce their impact on the marine environment <del>including, where appropriate, the ban of use of the micro plastic in specific products.</del>	Regional	SE, DE, EU, PL
L1F	Clarification/research on the importance of sanitary waste in the upstream waste flows	Regional, national	RU

**Comment [A8]:** A general comment: In the table, how and by whom has the priority, the column with country codes been set?

**Comment [A9]:** 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 [A10]:** 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 are listed by all, and some only by a few countries and some not by any country – I can't recall that we had this discussion on every action during...

**Comment [A11]:** What does that mean?

**Comment [A12]:** An Aspect is missing in the list L1: Management of tourist beaches by municipalities, counties etc. - Definition or...

**Comment [A13]:** could we add a column to the most left of the table for running numbers? Might make working with the sheets easier.

**Comment [A14]:** PREVENTION: at the present wording, it is confusing and not understandable why most of the measures were affiliated to this...

**Comment [A15]:** This is what is written in <http://ec.europa.eu/environment/waste/pdf/Legal%20proposal%20review>...

**Comment [A16]:** We think it is not a reasonable measure. Developing a measure to divert waste into a resource does not help in any way to...

**Comment [A17]:** Can not be done. All that concerns microplastics, is not in our estimation that significant. The scales are too different. First we...

**Comment [A18]:** Right now this action is defined very widely by “all products”, this also gives uncertainty how different countries...

**Comment [A19]:** WWF is of the opinion that the negative impact of micro plastic on the marine environment is well known, therefore...

**Comment [A20]:** Should this measure be in this Action Plan?

**Comment [A21]:** If this means “upstream in rivers and refers to sewage outlets into rivers” then should be written...

L1G	Enhance national stakeholder alliances focusing on marine litter	National	
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, <u>and Based on this evaluation act to reduce theirthe irtheirtheir impact of microparticles on the marine environment</u>	Regional, national	SE, DE, EU, PL
<b>II. MINIMISATION</b>			
L2A	Share best practice on waste management, e.g. on landfill bans of high caloric wastes (especially for plastics)	Regional	DE

**Comment [A22]:** 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 [A23]:** 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 thinking about wastes, to make an effort that wastes end up in the garbage bin not into the sea. And then we can talk about microplastics. We are afraid that these measures in this action plan are not implementable in Estonia when we talk about all the monitoring and reporting that it needs.

**Comment [A24]:** This we have (ES). We have good examples from waste handling practices which we could share if needed.

**Comment [A25]:** Combine with L1A?

L2B	Evaluate the potential harm caused to the marine environment by items such as cigarette filters/butts, balloons, shotgun wads, cotton buds and bio-film 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 a dialogue with industry dialogue aimed at highlighting the top marine litter problem items with the aim to.....	Regional, national	
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 for reducing and preventing sewage and storm water related waste entering the marine environment, including micro particles	Regional, national	SE, DE, EU, PL

**Comment [A26]:** Not doable Seems like it is a problem to certain countries for the list is very specific? But what about then Chinese lanterns, plastic bags, PET-bottles?

**Comment [A29]:** Will this evaluation be done by FI and DE and based on the outcome then all countries will take measures to reduce the negative effects? Or how to read this table?

**Comment [A27]:** How have the items been selected? Should it be based on top ten litter items found on the beaches around the Baltic Sea or should it be especially problematic items?

**Comment [A28]:** Are these commonly observed in the sea water?

**Comment [A30]:** Not doable Seems again like it is a problem to certain countries? We are not planning (EE) this and probably it will not be a priority either.

**Comment [A31]:** Why is FI here?

**Comment [A32]:** Should it be linked to the action below L2D?

**Comment [A33]:** Declarative measure. We (EE) would not like to take this as an obligation.

**Comment [A34]:** If "explore with industry" then industry will be well informed on alternatives!

**Comment [A35]:** Combine with L2D?

**Comment [A36]:** 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.

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 <del>in special</del> <del>special</del> 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
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"> <li>– Levies on single-use carrier bags</li> <li>– Fiscal and economic instruments to promote the reduction of plastic bag consumption, in particular less than 0.0250250 mm thick</li> <li>– Ban on single-use plastic bags or plastic bag taxes and charges (in parallel, alternatives should be developed)</li> </ul>	Regional, national	EU

**Comment [A37]:** 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)

**Comment [A38]:** 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 [A39]:** 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

	<u>Identify the ten most common types of litter found on beaches with a view to reducing their quantity by 30% by 2020</u>		
L2K	Provide an overview of what product categories contain micro beads and that are <u>not currently covered</u> 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 <u>reducing/reusing/recycling</u> measures in order to reduce the fraction of plastic packaging waste that goes to landfill <u>or incineration without energy recovery</u>	National	
L3B	Establishment of Deposits, Return and Restoration System for expandable polystyrene boxes in the fishing sector	National	

**Comment [A40]:** Does this mean there is already legislation preventing the entry of microparticles into the marine environment? I don't really understand the relevance of the "not currently covered by legislation" bit.

**Comment [A41]:** Could this be combined with: Evaluate all products and processes that include primary micro plastics and act, if appropriate, to reduce their impact on the marine environment?

**Comment [A42]:** Not doable. If we talk about phasing out the use of microplastics, it can not be at the state level. In Estonia there are not that many manufacturers, so this question should be solved in our mind at EU level, it also concerns EU free market.

**Comment [A43]:** Not doable. And what is meant by this measure? For the country to support developing such technology and measures (support how is then the question?), for the country itself will probably not develop such technology and measures.

**Comment [A44]:** To minimise degradation would mean that plastic products would have an even longer lifespan in the marine environment. One of the arguments often used against plastic is its durability and long lifespan. The longer a net survives the potentially more harmful it becomes. Perhaps what is meant is that plastics should decompose to chemical

**Comment [A45]:** Not doable. Too specific.

**Comment [A47]:** This is far too detailed. Can be used as examples e.g. in L2G

**Comment [A46]:** This measure should be expanded or formulated more open. So it may also include th

**Comment [A48]:** It is important but the link to ML is a bite weak. I think this issue is taken care of in other fo

**Comment [A49]:** This makes no reference to marine debris.

**Comment [A50]:** Because we do not have an analysis about the problem products which end up in the sea, it

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IV. RECYCLING			
L4A	Encourage the development and implementation of Sustainable Procurement Policies that contribute to the promotion of recycled products and <del>its</del> <del>their</del> <del>consumption</del> <del>use</del> <del>consumption</del> , in particular <del>plastics</del> <del>plastic</del> , focusing on those products that <del>have</del> impact upon the marine environment	National	
L4B	Implement adequate waste <del>reducing/reusing/</del> recycling measures in order to reduce the fraction of plastic packaging waste <del>that goes to landfill</del> <del>or incineration</del> <del>without energy recovery</del>	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	<del>Close</del> <del>As far as possible</del> <del>Celose</del> <del>to the extent possible</del> the existing illegal dump sites on land <del>in</del> the area of the application of the Regional Plan	National	EU, PL
L5C	Take necessary measures to establish <del>as</del> appropriate adequate urban sewer, wastewater treatment plants, and waste management systems to prevent run-off and riverine inputs of litter	National	

**Comment [A51]:** Is it likely that this action will have an effect on what we actually find in the marine environment? Otherwise remove.

**Comment [A52]:** It is already now highly recommended. So do we need this kind of a measure here? Maybe we should have an analysis what current regulations foresee and how this measure influences them.

**Comment [A53]:** Beschaffen, besorgen!  
Don't understand who is meant here! Supermärkte, Strandbars, Events....? Nachhaltige Beschaffungskonzepte?

**Comment [A54]:** It is important but the link to ML is a bite weak. I think this issue is taken care of in other fora therefore suggest to remove this action.

**Comment [A55]:** This makes no reference to marine debris.

**Comment [A56]:** Analysis needed of the current regulations?

**Comment [A57]:** and cans?

**Comment [A58]:** Including expanding of deposit refund systems and creating higher incentives?

**Comment [A59]:** In Estonia we could do information campaigns to people for them to buy

**Comment [A60]:** Integrable in measure L2N, see there.

**Comment [A61]:** this could as well be under topic II: "Explore with

**Comment [A62]:** Too detailed. Not doable.

**Comment [A63]:** the Action Plan cannot state 'Replace plastic ...'.

**Comment [A64]:** Integrable in measure L2N, see there.

**Comment [A65]:** same comment, is this the same place, and could it be

**Comment [A66]:** Missing in Estonia.

**Comment [A67]:** This is not a problem in SE. But if it is a common

**Comment [A68]:** why is there this precaution, why not just close?

**Comment [A69]:** If they are illegal then the "to the extent possible" bit

**Comment [A70]:** If known dump sites are illegal, then they must be

L5D	<del>Compulsory</del> Promote beach cleaning by local communities, <u>organised groups of volunteers</u> and/or private companies (i.e. of the tourism sector); or incentives for beach cleaning (e.g. awards, like the "Blue flag award. <u>Street cleansing in coastal urban cities/river are perhaps even more important.</u>	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. 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		

**Comment [A71]:** Can not be as a mandatory measure. We (EE) can support volunteer activities and these are done right now in Estonia. Proposal to change wording into softer by using the word promote.

**Comment [A72]:** WWF suggests to add "organised group of volunteers" as one of possible groups to be involved in beach cleaning.

**Comment [A73]:** We (EE) support exchanging best practices but we hesitate should we develop a separate system for that.

**Comment [A74]:** Will DE try to make this kind of a system that others then can also use if suitable, or what is meant by DE here?

**Comment [A75]:** , to be replaced something like 'Develop measures for...'

**Comment [A76]:** Which kind of measures are meant here? Specific or any?

**Comment [A77]:** Which ones?

**Comment [A78]:** to be developed?

**Comment [A79]:** This is still very vague?

**Comment [A80]:** See category referring to F4L

**Comment [A81]:** BSH: If "Marine Litter" as defined in Article 1 No. 8 is concerned

**Comment [A82]:** BSH: With respect to Article 3, especially No. 1, measures concerning the mandatory discharge in port should refer to "Marine Litter" as defined in Article 1. No. 8; perhaps it might be reasonable that this measure applies only for "garbage" in terms of MARPOL Annex 5.

**Comment [A83]:** BSH: Mandatory discharge to prfs in due consideration of the exception according to HELCOM Convention Article 8, Regulation 6 and Article 7 par. 2 of the Directive 2000/59/EC for port facilities for ship-generated waste and cargo residues

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 6

#### 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
<b>I. MEASURES TO ENFORCE EXISTING MARINE LITTER REGULATIONS</b>			
S1A	Ensure the full implementation of HELCOM Convention Article 8 especially Regulation 6; <u>Mandatory discharge of all wastes to port reception facilities, including implementation with regards to smaller ship types like fishing vessels.</u>	Regional	ALL

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 data, taking into consideration the Paris MOU on port state control / [recommend the Paris MOU to do it]	Regional	ALL
<b>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)</b>			
S2A	Through a multinational <del>projects</del> project, together with the fishing industry, <del>and</del> competent authorities <u>and non-governmental organizations</u> , develop and promote best practice in relation to <del>marine litter</del> ALDFG. All relevant aspects (including e.g., <u>reporting on accidental loss or discharge of fishing gear under MARPOL</u> , <del>mapping hotspots</del> , <del>dolly rope</del> , waste management on board, waste management at harbours and operational losses/net cuttings) should be included	Regional	SE, PL, ES, DE
	<b>Assessment</b>		
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 <del>could</del> 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	
	<b>Prevention &amp; minimization</b>		
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

**Comment [A84]:** It could be specified which data and what kind of reporting..

**Comment [A85]:** Ship inspections are already carried out in accordance with Paris MoU. To consider deletion of this part of the sentence?

**Comment [A86]:** 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 [A91]:** 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.

**Comment [A87]:** Reporting is required by the regulation 10.6 of MARPOL Annex V.

**Comment [A88]:** This is another action see S2C

**Comment [A89]:** This is another action see S2D

**Comment [A90]:** WWF is of the opinion, that non-governmental organisations should be included in the project aimed at reducing the impacts from the ALDFG. Organisations such as WWF and KIMO Baltic have experiences with such a projects that could be used to further reduce the impact of ALDFG on the marine ecosystem.

**Comment [A92]:** Entries S2B and S2C should also be linked to each other and S2B should feed information into S2C. Therefore, S2B needs to be reworded to something like: 'Identif ...

**Comment [A93]:** At the moment the current wording is not the best. We should reformulate it to state that there should be a system ...

**Comment [A95]:** shipping routes and areas of military highest activity should be taken into account for the determination of priority

**Comment [A94]:** how does this differ from S2B? maybe they can be combined?

**Comment [A96]:** Maybe we should not define this in so detailed (only one concrete product), we should define it in a more genera ...

**Comment [A97]:** This measure is a general one, we (EE) propose to move this to prevention section.

S2G	Explore and implement the “Gear marking to indicate ownership” concept and the “reduced ghost catches through the use of environmental neutral upon degradation of nets, pots and traps <del>concept</del> ”, 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 on land	Regional, national	All
<b>III. MEASURES ON PORT RECEPTION FACILITIES (PRFs) AND THE APPLICATION OF THE NO-SPECIAL-FEE SYSTEM</b>			
S3A	Further work on implementation and harmonization of the no-special-fee system (addressing as possible <ul style="list-style-type: none"> <li>- gaps in existing regulations,</li> <li>- enforcement and practices concerned shipping,</li> <li>- port reception facilities auditing to assess adequacy of garbage collection, strive for</li> <li>- fair waste burden sharing between ports).</li> </ul>	Regional	DE
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 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 GIS (Global Integrated Shipping Information System) and HELCOM	National	
<b>IV. MEASURES ON FISHING FOR LITTER INITIATIVES</b>			
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 <del>relict fishing gears</del>	Regional, national	

**Comment [A98]:** gear marking is already compulsory

**Comment [A99]:** 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 [A100]:** I would move this right after S2D

**Comment [A101]:** This measure need additional national funding. And we (EE) 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 [A102]:** 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 th...

**Comment [A103]:** What is meant?

**Comment [A104]:** WWF highlights that the non-special-fee system has not been implemented in all Baltic ...

**Comment [A105]:** S3B – SE do not support that the Helcom Cooperation Platform is used to conduct work ...

**Comment [A106]:** As used for the first time the abbreviation should be explained.

**Comment [A107]:** S3C – SE suggest that this action is removed from the actionplan since it is a usual procedu...

**Comment [A108]:** S3E – What is meant by “improve implementation”? Does it mean that it should be ...

**Comment [A109]:** BSH: Compare MEPC1./Circ.671/Rev.1: ISO 21070:2011

**Comment [A110]:** S3F – What does it mean that the information will be submitted to HELCOM.

**Comment [A111]:** It should also involve incentives measures/programs for fishermen.

**Comment [A112]:** The writing of this action is difficult to understand. Is it only ML that is generated by ...

**Comment [A113]:** What does this mean?

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	
<b>V. MEASURES ON PLEASURE BOATING</b>			
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 [A114]:** S4A, S4B can be implemented in Estonia. But again there is the question of additional funding needed.

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).

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

Article 7

Addressing removal and disposal of existing marine litter

**Comment [A115]:** To be further elaborated from the land-based and sea-based measures those focused on removal and disposal.

Article 8

Addressing education and outreach on marine litter

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CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPLEMENTATION	PRIORITY
<p>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</p>			
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 <del>society</del> <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	
<p>II. <del>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</del></p>			

**Comment [A116]:** A proposal to add here internationally known Estonian "Let's do it" campagne (<http://www.teemeara.ee/en/>)?

**Comment [A117]:** Not doable.

**Comment [A118]:** should also include providing extreme examples on impacts of marine litter

**Comment [A119]:** 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 fishermen, highlighting the marine litter problem and including codes of practice."

**Comment [A120]:** WWF suggests to add "organised group of volunteers" as one of possible groups to be involved.

**Comment [A121]:** Redundant? See point I. above.

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 <a href="#">plastics particles</a>		
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"> <li>– The UNEP’s Global Programme of Action for the Protection of the Marine Environment from Land-based Activities (GPA-Marine);</li> <li>– Regional Seas Action Plans;</li> <li>– The Global Partnership on Marine Litter (GPML);</li> <li>– The Global Partnership on Waste Management (GPWM); and</li> </ul> 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		

[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 carried out will be subject to 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 in the trends of quantities and properties of marine litter in the Baltic sea marine environment, including litter in biota, litter on the seafloor, in the water column and on beaches (paragraph 2.4.h of Attachment 2

of the HELCOM Monitoring and Assessment Strategy, 2013), as well as where possible the further identification of sources and pathways (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 2015 coordinated monitoring programs for the common marine litter indicators as developed within HELCOM CORESET II will be developed.

## Section V – Reporting

1. HELCOM Contracting Parties should report regularly against their implementation of measures and achievement of corresponding operational targets as 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 2018, using the format in Annex II and following the reporting duties of the MSFD.

## Section VI – Timetable for implementation

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

Annex I – Area of application of the Action Plan



## Annex II – 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”.

<b>Country</b>	
<b>Date</b>	
<b>Contact person</b>	
<b>Affiliation</b>	
<b>E-mail</b>	
<b>Telephone</b>	
<b>Skype</b>	
<b>Type of measure<sup>1</sup></b>	
<b>Code of measure<sup>2</sup></b>	
<b>Measure</b>	
<b>Implementation period</b>	From: To:
<b>Status</b>	
<b>Description of the measure</b>	
<b>Responsible organization</b>	
<b>Other organizations involved</b>	
<b>Geographical area covered</b>	
<b>URL to the initiative</b>	
<b>Type of marine litter targeted<sup>3</sup></b>	
<b>Compartment targeted<sup>4</sup></b>	

<sup>1</sup> Please 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.

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

<sup>3</sup> 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
<b>ALDFG</b>	Abandoned, lost or otherwise discarded fishing gear
<b>Food related waste</b>	Food and beverage related waste, i.a. plastic and glass bottles, “six-pack” rings, plastic caps/lids, disposable cutlery and cups, straws
<b>Plastic bags</b>	Single use plastic bags and shopping bags
<b>Plastic waste</b>	All type of plastic waste. Indicate as appropriate: macro-, meso-, micro-plastics or plastic microbeads
<b>Sanitary waste</b>	Household sanitary waste, i.a. sanitary pads and/or tampons, diapers, razors, cotton bud sticks
<b>Smoking related waste</b>	Disposable lighters, cigar tips, cigarette butts

<b>Source targeted<sup>5</sup></b>	
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## Annex III – Reporting format on the effectiveness of the implemented measures

<b>Country</b>	
<b>Date</b>	
<b>Contact person</b>	
<b>Affiliation</b>	
<b>E-mail</b>	
<b>Telephone</b>	
<b>Skype</b>	
<b>Type of measure<sup>6</sup></b>	
<b>Code of measure<sup>7</sup></b>	
<b>Measure</b>	
<b>Implementation period</b>	From: To:
<b>Status</b>	
<b>Description of the measure</b>	
<b>Responsible organization</b>	
<b>Other organizations involved</b>	
<b>Geographical area covered</b>	
<b>URL to the initiative</b>	
<b>Type of marine litter targeted<sup>8</sup></b>	

<sup>4</sup> Please select accordingly: beach, water column, water surface, sea bed, tidal flat, river bank, shipwreck, sediment, biota.

<sup>5</sup> Please indicate which land-based or sea-based source of marine litter is addressed by the measure.

<sup>6</sup> Please 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.

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

<sup>8</sup> 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
<b>ALDFG</b>	Abandoned, lost or otherwise discarded fishing gear
<b>Food related waste</b>	Food and beverage related waste, i.a. plastic and glass bottles, “six-pack” rings, plastic caps/lids, disposable cutlery and cups, straws
<b>Plastic bags</b>	Single use plastic bags and shopping bags
<b>Plastic waste</b>	All type of plastic waste. Indicate as appropriate: macro-, meso-, micro-plastics or plastic microbeads

<b>Compartment targeted<sup>9</sup></b>	
<b>Source targeted<sup>10</sup></b>	
<b>Cost of the initiative</b>	
<b>Financing source</b>	
<b>Challenges<sup>11</sup></b>	
<b>Results achieved</b>	
<b>Results expected</b>	
<b>Negative impacts</b>	
<b>Next steps</b>	
<b>Comments</b>	

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<b>Sanitary waste</b>	Household sanitary waste, i.a. sanitary pads and/or tampons, diapers, razors, cotton bud sticks
<b>Smoking related waste</b>	Disposable lighters, cigar tips, cigarette butts

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

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

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