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<b>Document title</b>	Working document on measures and operational targets on Marine Litter for the Baltic Sea (Section III of the RAP ML)
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<b>Agenda Item</b>	4 – Working groups on measures and operational targets on Marine Litter for the Baltic Sea (Section III of the RAP ML)
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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 identified measures to combat marine litter in the Baltic Sea as identified in the Draft 0 of the HELCOM Action Plan on Marine Litter together with the comments received from Contracting Parties and Observers. This document is to be further elaborated in the three breakout-groups (BG 1 – land based, BG 2 – sea based and BG 3 – education and outreach measures to address marine litter in the Baltic Sea) to be arranged in the 2<sup>nd</sup> Regional Workshop on Marine Litter.

### Action required

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

LAND-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
<b>I- PREVENTION</b>							<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: DE, PL)</b>	N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: EU)</b>	N					<a href="#">Yes</a>
L1C	Develop of End of Waste criteria to divert waste into a resource (only for EU MS, following waste/resource efficiency legislation)	N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: DE, PL)</b>	N					No
L1E	Evaluate all products and processes that include primary micro plastics and act, if appropriate, to reduce their impact on the marine environment <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	R					<a href="#">Yes</a>
L1F	Clarification/research on the importance of sanitary waste in the upstream waste flows <b>(Priority during 1<sup>st</sup> WS: RU)</b>	R, N					<a href="#">Yes</a>
L1G	Enhance national stakeholder alliances focusing on marine litter	N					No
L1H	Encourage international environmental certification schemes to include the management and prevention of marine litter in their lists of criteria	R					<a href="#">Yes</a>
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 in river and river basin management plans <b>(Priority during 1<sup>st</sup> WS: DE)</b>	R, N					<a href="#">Yes</a>
L1J	Exchange experience on best practice to prevent litter entering into water systems and highlight these to River or River basin Commissions	R, N					No
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 act to reduce their impact on the marine environment <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	R, N					<a href="#">Yes</a>

LAND-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
<b>II- MINIMISATION</b>							
L2A	Share best practice on waste management, e.g. on landfill bans of high caloric wastes (especially for plastics) <b>(Priority during 1<sup>st</sup> WS: DE)</b>	R					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: FI, DE)</b>	R, N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: FI)</b>	R, N					<a href="#">Yes</a>
L2D	Carry out industry dialogue aimed at highlighting the top marine litter problem items	R, N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: FI, DE)</b>	R, N					<a href="#">Yes</a>
L2F	Investigate and promote with appropriate industries the use of Best Available Technologies to develop sustainable and cost effective solutions to reducing and preventing sewage and storm water related waste entering the marine environment, including micro particles <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	R, N					<a href="#">Yes</a>
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	N					<a href="#">Yes</a>
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 refill special and reusable containers <b>(Priority during 1<sup>st</sup> WS: EU)</b>	N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: EU)</b>	N					No

LAND-BASED MEASURES

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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 - Levies on single-use carrier bags - Fiscal and economic instruments to promote the reduction of plastic bag consumption, in particular less than 0.025 mm thick - Ban on single-use plastic bags or plastic bag taxes and charges (in parallel, alternatives should be developed) <b>(Priority during 1st WS: EU)</b>	R, N		EU			<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	R, N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	N					<a href="#">Yes</a>
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. <b>(Priority during 1<sup>st</sup> WS: SE, DE, EU, PL)</b>	N					<a href="#">Yes</a>
L2N	Promote the use of sustainable alternatives to plastic drinking straws, stirrers and lollipop sticks <b>(Priority during 1<sup>st</sup> WS: FI)</b>	N					<a href="#">Yes</a>
							<a href="#">Yes</a>
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	N					<a href="#">Yes</a>
L3B	Establishment of Deposits, Return and Restoration System for expandable polystyrene boxes in the fishing sector	N					<a href="#">Yes</a>
<b>IV- RECYCLING</b>							
L4A	Encourage the development and implementation of Sustainable Procurement Policies that contribute to the promotion of recycled products and its consumption, in particular plastic, focusing on those products that impact upon the marine environment	N					<a href="#">Yes</a>
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	N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: FI)</b>	R, N					<a href="#">Yes</a>
L4D	Promoting the use of cardboard or other compostable materials instead of six pack plastic ring carriers	N					<a href="#">Yes</a>

LAND-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
L4E	Replace the plastic cotton swabs with paper/carton	N					<a href="#">Yes</a>
<b>V- DISPOSAL</b>							
L5A	Identify illegal and historic coastal landfill or dumpsites, including where these might be at risk from coastal erosion, and take action if appropriate <b>(Priority during 1<sup>st</sup> WS: SE, PL)</b>	N					<a href="#">Yes</a>
L5B	Close to the extent possible the existing illegal dump sites on land in the area of the application of the Regional Plan <b>(Priority during 1<sup>st</sup> WS: EU, PL)</b>	N					<a href="#">Yes</a>
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	N					<a href="#">Yes</a>
L5D	Compulsory beach cleaning by local communities and/or private companies (i.e. of the tourism sector); or incentives for beach cleaning (e.g. awards, like the "Blue flag award	N					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: DE)</b>	R, N					<a href="#">Yes</a>
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	R					No
L5G	Measures for removing river litter						<a href="#">Yes</a>

General comments

1. How and by whom has the priority, the column with country codes been set? The meaning and purpose of the table should be better explained, e. g. what does "Priority" and the listed CPs mean, especially in connection with the level of implementation?
  2. Priority means that all actions are mandatory to everyone but are for specific countries a very high priority? Or how to read this column?
  3. 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
  4. What does that (priority) mean?
  5. Could we add a column to the most left of the table for running numbers? Might make working with the sheets easier.
  6. 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.
  7. Since we have not analyzed 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 analyze the current situation, to have different projects looking into the severity of the issue and then we can set appropriate measures.
  8. 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 the implementation impossible.
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9. 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 analyzed 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.
  10. 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 analyze 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
  11. Waste Directive says that L1 and L2 are at the same level. If you cannot prevent you have to minimize. Should we also put them on one level?
  12. Also there is missing Recovery. Recycling does not cover Recovery. Recycling is one part of Recovery.
  13. 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; L5 - Disposal.
  14. Proposal is to use exact hierarchy given by the Waste Directive.
  15. 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.
  16. Denmark appreciates that the national measures are presented as measures that CPs should consider to implement.

**L1:**

1) An Aspect is missing in the list **L1**: Management of tourist beaches by municipalities, counties etc. - Definition or intensification of requirements to reduce plastic waste from landside through approval (e. g. for beach events) and lease requirements (e. g. for food/drink outlets), infrastructure of waste disposal or adaptation of local "beach and harbor statutes" for example. This measure is currently discussed for the MSFD implementation.

2) PREVENTION: at the present wording, it is confusing and not understandable why most of the measures were affiliated to this category. Actually, the vast majority of measures listed are not explicitly relevant to prevention. Further, when considering comments #3 and #5 above, would strongly suggest to merge two categories (I Prevention and II Minimisation) and reduce the total number of entries by at least of 50%. And the overarching umbrella topic should be 'MINIMISATION', which in certain and specific instances (but as much as feasible and practicable) has also prevention component.

**L1B**

1) This is what is written in

<http://ec.europa.eu/environment/waste/pdf/Legal%20proposal%20review%20targets.pdf> paragraph 26:

"Littering, especially of plastic, has a direct and detrimental impact on the environment and high clean-up costs are an unnecessary economic burden. The introduction of specific measures in waste management plans, financial support from producers within the extended producer responsibility schemes, and proper enforcement from the competent authorities should help eradicate this problem."

2) EU deleted.

**L1C**

We think it is not a reasonable measure. Developing a measure to divert waste into a resource does not help in any way to reduce marine litter. To avoid waste from ending up in the sea we should prevent/avoid, diverting waste into a resource is not a preventive measure. It is a possibility how certain wastes leave the waste regime, but this does not concern marine litter. For if/when these diverted wastes end up in the sea again, they would again be marine litter.

**L1E**

1) Can not be done. All that concerns microplastics, 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.

2) Right now this action is defined very widely by "all products", this also gives uncertainty how different countries will foresee this action and how realistic is the whole aim.

3) WWF is of the opinion that the negative impact of micro plastic on the marine environment is well known, therefore actions to prevent the input of micro plastic should be taken including ban of certain products that contain micro plastic. New test proposal: "Identify all products and processes that include primary micro plastics and take necessary actions, to reduce their impact on the marine environment including, where appropriate, the ban of use of the micro plastic in specific products."

4) Question: 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?

**L1F**

1) Should this measure be in this Action Plan?

2) If "in the upstream waste flows" means "upstream in rivers and refers to sewage outlets into rivers" then should be written "Clarify the importance of sewage outlets upstream in rivers with regard to the input of sanitary waste into the marine environment".

**L1H**

1) 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.

**L1I**

1) New test proposal: "HELCOM Contracting Parties to seek cooperation with the river and river basin authorities in order to include impacts of litter on the marine environment 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"

**L1K**

1) 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.

2) New test proposal: "Evaluate areas of risk to the marine environment from microparticles, specifically primary (i.e. for manufacturing) micro plastics, including activities that use microplastics. Based on this evaluation act to reduce the impact of microparticles on the marine environment"

**L2A**

1) This we have (ES). We have good examples from waste handling practices which we could share if needed.  
2) Combine with L1A?

**L2B**

1) 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?

2) 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?

3) "items": 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?

4) "bio-film support media used in sewage plants": Are these commonly observed in the sea water?

**L2C**

1) 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.

2) Why is FI here?

**L2D**

1) Should it be linked to the action below L2D? New test proposal: "Carry out industry dialogue aimed at highlighting the top marine litter problem items with the aim to ....."

**L2E**

1) Declarative measure. We (EE) would not like to take this as an obligation.

2) "in order to better inform industry on alternative solutions ": If "explore with industry" then industry will be well informed on alternatives!

3) Combine with L2D?

**L2F**

1) 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**

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)

**L2H**

1) New test proposal: "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 in special refill and reusable containers"

**L2J**

1) 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.

2) 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.

3) Propose to change "0.025 mm thick" to "0.050 mm thick".

**L2K**

1) To be deleted.

2) 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.

3) NEW MEASURE: "Identify the ten most common types of litter found on beaches with a view to reducing their quantity by 30% by 2020".

4) 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"?

**L2L**

1) 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.

**L2M**

1) 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.

2) 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 longlifespan. The longer a net survives the potentially more harmful it becomes.

Perhaps what is meant is that plastics should decompose to chemical elements and not to microparticles - perhaps what is meant by "the use of environmental neutral upon degradation of nets, pots and traps concept" in Measure S2G (see below)

Need clarification!

**L2N**

1) Not doable. Too specific.

2) This measure should be expanded or formulated more open. So it may also include the measures L4D and L4E. Maybe L2N can also be integrated into L2B. NEW TEST PROPOSED: "Promote the use of sustainable alternatives to potentially problematic marine litter items, which are frequently found in the marine environment (for example plastic drinking straws, stirrers and lollipop sticks, cigarette filters/butts, six pack plastic ring carries, plastic cotton swabs and so on)".

3) This is far too detailed. Can be used as examples e.g. in L2G.

4) NEW TEST PROPOSED: "Promote the use of sustainable alternatives to plastic (i.e.drinking straws, stirrers and lollipop sticks, etc.) ".

**L3A**

1) 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.

2) "or incineration without energy recovery " makes no reference to marine debris. NEW TEST PROPOSED: "Implement adequate waste reusing measures in order to reduce the fraction of plastic packaging waste that goes to landfill".

## COMMENTS ON LAND-BASED MEASURES

### L3B

1) 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.

### L4A

1) Is it likely that this action will have an effect on what we actually find in the marine environment?  
Otherwise remove.

2) 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.

3) Beschaffen, besorgen! Don't understand who is meant here! Supermärkte, Strandbars, Events....?  
Nachhaltige Beschaffungskonzepte?

4) NEW TEST PROPOSED: "Encourage the development and implementation of Sustainable Procurement Policies that contribute to the promotion of recycled products and their use, in particular plastic, focusing on those products that impact upon the marine environment"

### L4B

1) It is important but the link to ML is a bit weak. I think this issue is taken care of in other fora therefore suggest to remove this action.

2) "or incineration without energy recovery " makes no reference to marine debris.

3) NEW TEST PROPOSED: "Implement adequate waste recycling measures in order to reduce the fraction of plastic packaging waste".

### L4C

1) Analysis needed of the current regulations?

2) and cans?

3) Including expanding of deposit refund systems and creating higher incentives?

### L4D

1) In Estonia we could do information campaigns to people for them to buy paper/cardboard drinks. But this is all we could do/how we could influence.

2) Integrable in measure L2N, see there.

3) this could as well be under topic II: "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"

### L4E

1) Too detailed. Not doable.

2) the Action Plan cannot state 'Replace plastic ...'. Would rather suggest to 'Encourage replacing plastic...' or something on these lines.

3) Integrable in measure L2N, see there.

4) same comment, is this the same place, and could it be combined with the previous one (examples of smarter design)

### L5A

1) Missing in Estonia.

2) This is not a problem in SE. But if it is a common problem around the Baltic Sea it should be prioritized within the HELCOM RAP. If it is a national action SE can be removed.

### L5B

1) why is there this precaution, why not just close?

2) If they are illegal then the "to the extent possible" bit is not necessary

3) If known dump sites are illegal, then they must be closed by all means.

4) NEW TEST PROPOSED: "Close the existing illegal dump sites on land in the area of the application of the Regional Plan"

### L5C

1) (Eliminate "as") "Take necessary measures to establish appropriate adequate urban sewer, wastewater treatment plants, and waste management systems to prevent run-off and riverine inputs of litter"

**L5D**

- 1) 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.
- 2) WWF suggests to add "organised group of volunteers" as one of possible groups to be involved in beach cleaning. NEW TEST PROPOSED: "Compulsory 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."
- 3) NEW TEST PROPOSED: "Compulsory beach cleaning by local communities 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."

**L5E**

- 1) We (EE) support exchanging best practices but we hesitate should we develop a separate system for that.
- 2) 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?
- 3) To include also "urban areas".

**L5G**

- 1) To be replaced something like 'Develop measures for...'
- 2) Which kind of measures are meant here? Specific or any?
- 3) Which ones?
- 4) to be developed?
- 5) This is still very vague?

## SEA-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
<b>I. MEASURES TO ENFORCE EXISTING MARINE LITTER REGULATIONS</b>							
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. <b>(Priority during 1<sup>st</sup> WS: ALL)</b>	R					<a href="#">Yes</a>
S1B	Fully implement 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] <b>(Priority during 1<sup>st</sup> WS: ALL)</b>	R					<a href="#">Yes</a>
<b>II. MEASURES TO REDUCE IMPACTS FROM ALDFG (Abandoned, Lost or otherwise Discarded Fishing Gear)</b>							
S2A	Through a multinational project, together with the fishing industry and competent authorities, develop and promote best practice in relation to marine litter. All relevant aspects (including e.g. mapping hotspots, dolly rope, waste management on board, waste management at harbours and operational losses/net cuttings) should be included <b>(Priority during 1<sup>st</sup> WS: SE, PL, ES, DE)</b>	R					<a href="#">Yes</a>
<b>Assessment</b>							
S2B	Develop a risk assessment for identifying where accumulations of ghost nets pose a threat to the environment and should be removed <b>(Priority during 1<sup>st</sup> WS: ALL)</b>	N					<a href="#">Yes</a>
S2C	Identify hot spot areas through mapping of snagging sites or historic dumping grounds working with other initiatives, research programmes and with fishing organisations <b>(Priority during 1<sup>st</sup> WS: SE, PL, ES)</b>	R					<a href="#">Yes</a>
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)						<a href="#">Yes</a>

## SEA-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
S2E	Identify the options to address key waste items from the fishing industry and aquaculture, which could 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)	R,N					<a href="#">Yes</a>
<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 ( <b>Priority during 1<sup>st</sup> WS: ALL</b> )	R					No
S2G	Explore and implement “Gear marking to indicate ownership” concept and ‘reduced ghost catches through the use of environmental neutral upon degradation of nets, pots and traps concept’, in consultation with the competent international and regional organizations in the fishing sector ( <b>Priority during 1<sup>st</sup> WS: ALL</b> )	R, N					<a href="#">Yes</a>
<b>Removal &amp; disposal</b>							
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	R, N					No
S2I	Based on the risk assessment and identification of hot spot areas initiate removal of ghost nets and their further safe disposal ( <b>Priority during 1<sup>st</sup> WS: ALL</b> )	R, N					<a href="#">Yes</a>

## SEA-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
III. MEASURES ON PORT RECEPTION FACILITIES AND THE APPLICATION OF THE NO-SPECIAL-FEE SYSTEM							<a href="#">Yes</a>
S3A	Further work on harmonization of the no-special-fee system (addressing as possible gaps in existing regulations, enforcement and practices concerned shipping, port reception facilities auditing to assess adequacy of garbage collection, strive for fair waste burden sharing between ports) <b>(Priority during 1<sup>st</sup> WS: DE)</b>	R					<a href="#">Yes</a>
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	R, N					<a href="#">Yes</a>
S3C	HELCOM Contracting parties which are also EU member states to support EU in the revision of the PRFs Directive (Directive 2000/59/EC) <b>(Priority during 1<sup>st</sup> WS: SE)</b>	R					<a href="#">Yes</a>
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 <b>(Priority during 1<sup>st</sup> WS: ALL)</b>	R, N					No
S3E	Improve implementation of the ISO standard (ISO 201070:2013) in relation to port reception facilities	N					<a href="#">Yes</a>
S3F	Encourage submission of updated data on PRFs to IMO GISIS (Global Integrated Shipping Information System) and HELCOM	N					No
IV. MEASURES ON FISHING FOR LITTER INITIATIVES							

## SEA-BASED MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
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 derelict fishing gears	R, N					No
S4B	Identify and remove barriers to the processing or landfilling of marine litter collected in Fishing for Litter initiatives	R					No
S4C	Encourage all fishing vessels to be involved in Fishing for Litter schemes, where they are available	N					No
<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)	R					No
S5B	Development of instruments to prevent the disposal of old pleasure boats <b>(Priority during 1<sup>st</sup> WS: SE)</b>	N					No

**General comments**

- 1) **NEW TEST PROPOSED (beginning of Article 7), see category referring to F4L : "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..."**
- 2) **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.**
- 3) **Denmark appreciates that the national measures are presented as measures that CPs should consider to implement.**
- 4) **Denmark remarks that it is important to ensure that issues under the scope of the EU common fisheries policy are dealt with by the CFP. The regulation of fisheries is in general an EU matter and is built upon biological advisory from ICES and STECF.**

**S1A**

- 1) "Ensure the full implementation of HELCOM Convention Article 8 especially Regulation 6": BSH if "Marine Litter" as defined in Article 1 No. 8 is concerned.
- 2) "all wastes": 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.
- 3) "Mandatory discharge of all wastes to port reception facilities, including implementation with regards to smaller ship types like fishing vessels": 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.

**S1B**

- 1) It could be specified which data and what kind of reporting.
- 2) "control": Ship inspections are already carried out in accordance with Paris MoU. To consider deletion of this part of the sentence?
- 3) WWF highlighted that the measures included in the Annex V of the MARPOL convention should be fully implemented and enforced in all Baltic countries. NEX TEST PROPOSED: "Fully implement and enforce....."

**S2A**

- 1) 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.
- 2) Reporting is required by the regulation 10.6 of MARPOL Annex V. NEX TEST PROPOSED: "Through a multinational project, together with the fishing industry, and competent authorities, develop and promote best practice in relation to marine litter. All relevant aspects (including e.g., reporting on accidental loss or discharge of fishing gear under MARPOL, mapping hotspots, dolly rope, waste management on board, waste management at harbours and operational losses/net cuttings) should be included.
- 3) "mapping hotspots": This is another action see S2C.
- 4) "dolly rope": This is another action see S2D.
- 5) 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. NEX TEST PROPOSED: "Through multinational projects, together with the fishing industry, competent authorities and non-governmental organizations, develop and promote best practice in relation to ALDFG. All relevant aspects (including e.g. mapping hotspots , dolly rope , waste management on board, waste management at harbours and operational losses/net cuttings) should be included".

**S2B**

- 1) 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: 'Identify accumulation areas of ghost nets, where they pose threat ...'
- 2) At the moment the current wording is not the best. We should reformulate it to state that there should be a system where you can report ghost nets and based on the system ghost nets are taken out from the sea.
- 3) NEX TEST PROPOSED: "Develop a risk assessment tool that could be used...."
- 4) NEW MEASURE PROPOSED: "Assess fishing gear found at sea, with a view to reducing them by 30% by 2020".

**S2C**

- 1) shipping routes and areas of military highest activity should be taken into account for the determination of priority. NEW TEST PROPOSED: "Identify hot spot areas with special emphasis on shipwrecks and underwater constructions laid on the sea bottom through mapping of snagging sites or historic dumping grounds working with other initiatives, research programmes and with fishing organisations"
- 2) how does this differ from S2B? maybe they can be combined?

**S2D**

- 1) Maybe we should not define this in so detailed (only one concrete product), we should define it in a more general level, to investigate different products and where it is possible measures will be implemented to reduce their negative effect.

**S2E**

- 1) This measure is a general one, we (EE) propose to move this to prevention section.
- 2) Delete "could".

**S2G**

- 1) gear marking is already compulsory
- 2) NEW TEST PROPOSED: "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 concept, in consultation with the competent international and regional organizations in the fishing sector".

**S2I**

- 1) 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?
- 2) I would move this right after S2D
- 3) NEW TEST PROPOSED: "Based on the risk assessment and identification of hot spot areas initiate removal of ghost nets and their safe disposal on land".

**S3**

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?

**S3A**

1) 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.

2) What is meant? by "and practices concerned shipping". NEW TEST PROPOSED: "Further work on implementation and harmonization of the no-special-fee system (addressing as far possible

- gaps in existing regulations,
- enforcement and practices concerned shipping,
- port reception facilities auditing to assess adequacy of garbage collection,
- fair waste burden sharing between ports)."

3) 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. NEW TEST PROPOSED: "Further work on implementation and harmonization....".

**S3B**

1) 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.

2) As used for the first time the abbreviation (PRFS) should be explained.

**S3C**

1) SE suggest that this action is removed from the actionplan since it is a usual procedur 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.

2) to change "revision" to "review".

**S3E**

1) What is meant by “improve implementation”? Does it mean that it should be implemented within national regulations or does it mean to improve the implementation of the use of the ISO-standard?

2) BSH: Compare MEPC1./Circ.671/Rev.1: ISO 21070:2011. Change "201070:2013" to "21070:2013".

**S3F**

1) What does it mean that the information will be submitted to HELCOM.

**S4**

1) It should aslo involve incentives measures/programs for fishermen.

**S4A**

1) The writting of this action is diffucult to understand. Is it only ML that is generated by fishing vessels that is embraced by the FFL?

2) What does "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 derelict fishing gears" mean?

Fishing for litter is a system whereby litter caught in fishing nets during normal fishing activities is collected on bord ship and disposed of in a harbour. Litter generated by fishing vessels is only relevant to F4L if it has been fished from the seabed during normal fishing activities i.e. if it is ALDFG. Use ALDFG instead of derelict FG (see definitions at beginning). NEW TEST PROPOSED: change "derelict fishing gears" to "ALDFG".

3) The text indicates that only fishing vessels are generating the litter. We (DK) would prefer another wording, which takes into account that there might be many other potential sources for the marine litter.

**S4B**

1) S4A, S4B can be implemented in Estonia. But again there is the question of additional funding needed.

EDUCATION AND OUTREACH MEASURES

CODE	PRELIMINARY DETAILISATION / ITEMISATION OF MEASURES	IMPL. <sup>1</sup>	SPECIFY <sup>2</sup>	GEOGR. COVER <sup>3</sup>	OPERATIONAL TARGET <sup>4</sup>	LEAD CP. & SK. <sup>5</sup>	COMMENTS
<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>							<a href="#">Yes</a>
E1A	Develop marine litter assessment sheets on the development of material for education programmes, including those for professional seafarers and fishermen						<a href="#">Yes</a>
E1B	Promote and undertake education activities in synergy with existing initiatives in the field of sustainable development and in partnership with civil society (including activities related to prevention and promotion of sustainable consumption and production)						<a href="#">Yes</a>
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						No
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)	R, N					No

EDUCATION AND OUTREACH MEASURES

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

[Yes](#)

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						No
E2B	Encourage participation in International, EU and National Marine Litter Cleanup Campaigns						No
E2C	Promote the "Adopt a beach" system						No
E2D	Raising public awareness on the occurrence, impact and prevention of marine litter, including micro plastics						<a href="#">Yes</a>
E2E	Developing collective agreements between HELCOM Contracting Parties, NGO's and industry to tackle particular problems of marine litter	R, N					No
E2F	Engaging with global marine initiatives such as: - 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 Waste Management (GPWM); and The Honolulu Commitment and the Honolulu Strategy on marine debris						No
E2G	Supporting campaigns to engage the public before introducing legal and economic measures to produce behavioral change						No

General comments

- 1) General comment for chapter 9: We lost the most important educational sector – schools and children and youth!
- 2) Denmark appreciates that the national measures are presented as measures that CPs should consider to implement.

**I**

- 1) A proposal to add here internationally known Estonian “Let’s do it” campagne (<http://www.teemeara.ee/en>)?

**E1A**

- 1) Not doable.
- 2) should also include providing extreme examples on impacts of marine litter.
- 3) 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 seafahrers including fishermen, highlighting the marine litter problem and including codes of paractice.

**E1B**

- 1) WWF suggests to add "organised group of volunteers" as one of possible groups to be involved. NEW TEST PROPOSED: "Promote and undertake education activities in synergy with existing initiatives in the field of sustainable development and in partnership with society and organized groups of volunteers (including activities related to prevention and promotion of sustainable consumption and production)".

**II**

- 1) Redundant? See point I. above. NEW TEST PROPOSED: "OUTREACH/AWARENESS RAISING ON MARINE LITTER".

**E2D**

- 1) To change "plastics" to "particles"