



---

<b>Document title</b>	Proposal for amendments to the BSAP
<b>Code</b>	3-6
<b>Category</b>	DEC
<b>Agenda Item</b>	3 - Update of the Baltic Sea Action Plan
<b>Submission date</b>	29.08.2019
<b>Submitted by</b>	Finland
<b>Reference</b>	MARITIME 18-2018 Document 2-5 (Update of the HELCOM Baltic Sea Action Plan); MARITIME 19-2019 Document 3-1 (Concretization of existing HELCOM actions)

---

## Background

The HELCOM Ministerial Meeting in 2018 agreed on the update of the Baltic Sea Action Plan beyond 2021 reaffirming also the strong commitment of the Contracting Parties to strengthen the implementation of the BSAP and the follow-up declarations. The intention is that the updated BSAP will be adopted by the HELCOM Ministerial Meeting in autumn 2021.

The next step will be to discuss and finalize the updates as far as possible at the dedicated BSAP session as part of MARITIME 19-2019 on 23 September 2019.

Taking into account recent regional developments in the HELCOM Maritime Working Group and global developments at the IMO, Finland proposes the following activities and actions to be included in the updated BSAP beyond 2021.

### **.1 Underwater noise**

Anthropogenic underwater noise as an environmental issue has been gathering increasing attention in recent years. Scientific evidence suggests multiple detrimental impacts to marine fauna from both impulsive (e.g. pile driving, explosions) and continuous (e.g. shipping) sources. Global research, however, has been focusing more on oceanic environments and accordingly, all the results might not be directly compatible to the Baltic Sea.

More research is needed to increase the understanding of underwater noise in the Baltic Sea. One of the ways to promote the need for further research is to raise the awareness of policy makers, stakeholders and the general public of this relatively new and still poorly known pressure to the marine environment. Underwater noise is a very timely issue both at regional level in the Baltic Sea area, and global level at IMO.

- Action 1: to support more research on both the sources and impacts of underwater noise in the Baltic Sea and accordingly
- Action 2: to follow and contribute to discussions at the IMO

### **.2 Enhance Mitigation measures to decrease GHG emissions from shipping**

#### **- Alternative fuels and sources of energy**

In order to reach the targets set in the initial IMO strategy (2018) on reduction of GHG emissions from ships up to 2023, it is crucial to enhance the use of alternative fuels and sources of energy such as LNG, biofuels, wind energy, hydrogen, battery technology and fuel cells. Likewise, it is crucial to utilize the full potential of new technology, digitalization and data economy to scale the results globally.

Mitigation measures such as reduction of greenhouse gas emissions from international shipping should be a priority also for the HELCOM MARITIME WG and its sub-group GREEN TEAM.

- Action 1: to contribute in enhancing the use of alternative fuels and sources of energy in shipping
- Action 2: to follow and contribute to discussions at IMO

### **.3 Ban for food waste discharges into the Baltic Sea**

Eutrophication is one of the biggest threats for the Baltic Sea and its biodiversity. There are several sources of nutrients, food waste discharges from shipping as an example, which increase the nutrient levels and enhance the eutrophication process of the Baltic Sea.

The MARPOL Convention forms the legal framework for the prevention of pollution from ships. In the context of Annex V (garbage), the Baltic Sea is a special area where the discharge regulations are stricter than outside Special areas. Yet it is still possible to discharge comminuted or ground food waste into the Baltic Sea while en route and as far as practicable from the nearest land, but no less than 12 nautical miles from the nearest land (garbage). The requirement to comminute or ground the food waste is even more harmful since these nutrients intensify algae growth.

Accordingly, we should ban any of food waste into the Baltic Sea.

- Action: To achieve an agreement among the Contracting Parties to the Helsinki Convention to ban any discharges of food waste into the Baltic Sea, and accordingly send a joint submission to IMO on amendments to the MARPOL Annex V to ban food waste discharges

### **.4 Ban for sewage discharges from cargo ships and formulate a roadmap for banning grey water discharges into the Baltic Sea**

The Baltic sea was the first sea area in the world to receive status as a special area of MARPOL Annex IV for sewage and has this status enforced by the IMO in 2016. Set to come into effect in June 2021, passenger ships, including cruise ships, will be limited to discharging sewage into port reception facilities (PRF) or alternatively at sea only after treatment with advanced on-board sewage treatment plants able to reduce nutrient input into the sea. However, this special area regulation only applies for passenger vessels.

Given the fact that sewage from all vessels contains nutrients, such as phosphorus and nitrogen, which enhance and aggravate algal blooms and other symptoms of eutrophication, one of the main environmental concerns in the Baltic Sea area, an effective ban on all sewage discharges should be considered for cargo vessels.

Regarding marine litter, cruise ship grey water can contain far more microplastics and other pollutants than black water. For cargo (merchant) ships the difference is not as great, but still significant. The potential for regulating the discharge of grey water has been discussed at the IMO. Annex IV of the MARPOL Convention, sets ambitious standards for ship black water discharges from passenger ships, but grey water as such is unregulated. .

The next regulatory challenge for delicate sea areas like the Baltic Sea will most likely be the treatment of grey water to the same standard as black water, and HELCOM should address this challenge. A proper balance should be achieved between ports and ship operators, as both carry responsibility.

- Action 1: To widen the scope of the Baltic Sea Special Area regulations under MARPOL Annex IV to cover also sewage discharges from cargo ships.
- Action 2: to formulate a roadmap for banning grey water discharges into the Baltic Sea

## .5 Biofouling

The IMO has issued the *Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species* (Biofouling Guidelines) (resolution MEPC.207(62)). The intention of the guidelines is to give measures and best practices on how to prevent the spread of aquatic organisms on ships' hulls. These biofouling guidelines will be revised in the IMO's Pollution Prevention and Response (PPR) sub-committee's 7<sup>th</sup> and 8<sup>th</sup> sessions in 2020 and 2021. It is also expected that an international convention for biofouling will be developed in the future.

Consequently, the work needs to be started also at regional level. Especially in short sea shipping and recreational boating, biofouling may be an even greater vector for spreading aquatic organisms than ballast water.

The proposed action point is related to the expectation that after the revision of the IMO Biofouling Guidelines, work toward an international convention will be started. Finland is of the view that it is important that the Baltic Sea regional aspects (i.e. ice conditions in winter time, low-salinity water, short and frequent voyages, etc.) will be taken into account already at the beginning of the work.

- Action: Work towards the International Biofouling Convention by contributing to the work carried out in the International Maritime Organization (IMO).

### Action requested

The Meeting is invited to discuss the activities proposed by Finland and act as appropriate.