



Document title	The Baltic Shadow Plan: For the future of the Baltic Sea. NGO's key asks for the revised BSAP – relevant for HELCOM MARITIME
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Background

In the process of updating the HELCOM Baltic Sea Action Plan, NGOs across the Baltic Sea Region have together formulated recommendations throughout all themes of the current BSAP to be considered by the HELCOM Contracting Parties. These recommendations have formed the [Shadow Plan](#) and are to complement actions that are currently missing, still to be addressed or need to be altered to deliver the founding goal of the BSAP to “restore the Baltic marine environment to a good ecological status by 2021.” These recommendations have been presented to 2020 HELCOM Stakeholder Conference and following it [HELCOM 41-2020](#) that agreed to put the Shadow Plan forward to the HELCOM Working Groups for further consideration in the light of the BSAP update.

The general message of our joint Shadow Plan is as follows:

We are in the middle of a biodiversity and climate crisis. The coming decade will be decisive for safeguarding biodiversity and our future. A collapsed Baltic cod population is the most alarming indication yet, signalling the very real need to change and manage the entire ecosystem where we continue to fish, build and extract. **By implementing the existing nature protection policies and stepping up the political commitments, we can deliver that change – but we must act now.**

We call on all the Baltic Sea countries to take up their responsibility to immediately and effectively follow up the commitments of the 2007 HELCOM BSAP and further strengthen those by adopting a revised 2021 Action Plan that aims to:

Set two main goals for all segments of the BSAP

- **Curtailing biodiversity loss in the catchment area in the next 5 years and bending the curve on biodiversity loss by 2030 in the region**
- **Achieving climate neutrality (net zero emissions) in the Baltic Sea by 2040.**

With specific to HELCOM MARITIME the actions presented in this document are suggested to be included/reflected in the update of the BSAP.

Action requested

The Meeting is invited to consider the recommendations provided in the Shadow Plan to the BSAP of relevance for HELCOM MARITIME and utilize these accordingly in developing content for the updated Action Plan.

The [Baltic Shadow Plan](#): For the future of the Baltic Sea. NGO's key asks for the revised BSAP – relevant for HELCOM MARITIME

BIODIVERSITY

RECOGNIZING impacts on marine life by anthropogenic underwater noise, WE ALSO URGE that

- Any activity generating impulsive sound should be coupled with adequate mitigation measures.
- Measures to reduce noise pollution within and outside MPAs for noise sensitive species should be put in place, such as annual seasonal closures, reduced speed, re-routing, sonar regulation, and buffer zone around the MPAs for impulsive noise.
- Generally, best practices for mitigating both impulsive and continuous underwater noise should be promoted and put in place throughout the Baltic Sea Area for the implementation of the HELCOM Regional Action Plan on Noise. Examples are:
 - o application of noise abatement systems during pile driving as demonstrated by Germany
 - o mandatory use of bubble curtains or other mitigation measures when exploding Unexploded Ordnance (UXOs)
 - o ban air gun surveys for oil and gas exploration as it does not comply with climate goals
 - o use of alternative technology for other geological surveys if needed
 - o setting safe frequency range when using military sonars
 - o Slow steaming for commercial ship traffic as demonstrated by Canada to only reduce noise, but also emissions
- Sound emission through leisure boats should be reduced with immediate effect, e.g. through speed reduction, and the limitation of sonar use in certain areas and to frequencies above 150 kHz.

EUTROPHICATION

FOLLOWING the implementation of sewage discharge from ferries and passenger ships, WE URGE that no nutrient discharge should be allowed from any shipping vessel in the Baltic Sea by ensuring that

- Adequate reception facilities for ship-generated sewage in all ports or adequate and standardised onboard treatment plants are in place.
- All discharge of food waste (including comminuted or ground) from shipping into the Baltic Sea is prohibited and the Baltic Sea states suggest respective amendments to MARPOL Annex V1.
- The discharge of grey water from passenger ships into the Baltic Sea is banned.
- Sewage discharge is banned and extended to cover not only passenger ships but all commercial vessels in the Baltic Sea

BEING CONCERNED by the impacts of dry bulk transportation of fertilisers by the Baltic Sea shipping, WE ALSO URGE that

- Packaged or containerised transportation should be only allowed based on Best Available Technology (BAT) (also the use of reusable or recyclable packaging instead of plastic bags).
- No hold washing discharge should be allowed into the Baltic Sea to prevent cargo-generated nutrient inputs.
- HELCOM to introduce above ban within the Baltic Sea Area as a pilot for International Maritime Organisation (IMO)/global action.

¹ Annex V of the MARPOL Convention aims to eliminate and reduce the amount of garbage being dumped into the sea from ships. Its terms include all kinds of food, domestic and operational waste that are likely to be disposed of during the normal operation of the ship.

MARITIME ACTIVITIES
<i>WE CALL to stop any negative impact through commercial shipping and recreational boating by</i>
<ul style="list-style-type: none"> - Recommending 'slow steaming' as a Best Available Technology (BAT) in EBSA areas including a buffer zone for vessels around MPAs. - Halting leakage of other harmful/hazardous substances from shipping activities, e.g. related to tank washing. - Forbidding the release of scrubber wastewater of open and half open systems into the Baltic Sea. - Reducing GHG emissions from Baltic shipping by 100% by 2050. - Minimising disturbances by recreational boating by enforcing no-go zones and restricted anchoring zones.
<i>WE ALSO CALL on further improvement in maritime safety to avoid shipping accidents and oil spills by</i>
<ul style="list-style-type: none"> - Developing and agreeing upon the methodology, and consequently carrying out, regular risk assessments of maritime accidents and associated spills of oil and other hazardous substances. - Proposing and reviewing additional Associated Protection Measures (APM) for the Baltic Sea Particularly Sensitive Sea Area (PSSA). - Including Russian waters in the Baltic Sea Baltic Sea Particularly Sensitive Sea Area (PSSA).
<i>WE URGE for continued development of oil spill preparedness and response capabilities by</i>
<ul style="list-style-type: none"> - Ensuring that all aspects of oil spill response, including at sea response, shoreline response and oiled wildlife response, are fully acknowledged and integrated into one command structure for planning, preparedness and response purposes. - Further developing sensitivity mapping according to international standards, including the recognition of offshore and nearshore wildlife vulnerabilities outside of protected areas. - Ensuring national and regional response preparedness standards that allow for the recognition and full integration of professional NGOs into nationally funded training and exercise programmes.
<i>WE ALSO URGE to stop any negative impact through offshore oil and gas installations by</i>
<ul style="list-style-type: none"> - Phasing-out offshore oil and gas production in the Baltic Sea.
<i>WE FURTHER URGE for no delay in transparently controlling and implementing the next steps of the Ballast Water Management Convention through the following steps</i>
<ul style="list-style-type: none"> - Providing transparent information that is easily accessible on the authorities responsible for controlling the implementation of the BWMC. - Pointing out loopholes within the Ballast Water Management Convention and adapt the controls. - Carrying out regular surveys on the potential impact of the chemical treatment of ballast water according to the D2 standard of the BWMC on the ecosystem of the Baltic Sea.
<i>WE REQUEST that no discharge from ship cargo holds should be allowed in the Baltic Sea Area by</i>
<ul style="list-style-type: none"> - Developing and implementing control and reduction of hazardous substance in cargo residues discharge, to prevent that paraffins and other cargo residues or tank washing substances are found on beaches/along the coastline. - Developing and requiring mandatory port reception facilities is put in place and is always used for hold washing water.