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<b>Document title</b>	Transfer of unaccomplished regional and national actions to the updated BSAP
<b>Code</b>	2-1
<b>Category</b>	CMNT
<b>Agenda Item</b>	2-Follow-up of HELCOM actions
<b>Submission date</b>	14.5.2019
<b>Submitted by</b>	Secretariat
<b>Reference</b>	

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## Background

The PRESSURE 9-2018 Meeting reviewed the existing actions from the Baltic Sea Action Plan and Ministerial Declarations 2010 and 2013 that have not been implemented yet and made initial remarks on how they could be taken forward or the need to clarify the actions. PRESSURE 10-2019 continued the discussion on how to proceed with the joint and national actions that will likely not be accomplished by 2021 and could be transferred to the updated Baltic Sea Action Plan ([document DS-9](#) of PRESSURE 10-2019). PRESSURE 10-2019 agreed on a written procedure to provide comments on the suggested categorization of the actions in terms of need of rephrasing.

The attached document includes comments from Denmark, Finland, Germany and Sweden.

## Action requested

The Meeting is invited to:

- take note of the comments provided;
- discuss and agree on the proposal on categorization for joint actions identified as likely to remain in the updated BSAP by PRESSURE 9-2018;
- discuss and agree on the proposal on categorization of unaccomplished national actions in case of transfer to the updated BSAP noting that the tentative rephrasing of these actions is to be completed and agreed in spring 2020 according to the Work plan for the BSAP update.

The Contracting Parties are also invited to take a lead of the rephrasing of actions, where it is needed.

Joint actions: categorization for joint actions identified as likely to remain in the updated BSAP by PRESSURE 9-2018

Action (origin)	Comments from Pressure 9-2018	Categorization/Need for rephrasing
<b>Partly accomplished</b>		
Collect more information and assess the state of contamination with pharmaceuticals and their degradation products of the aquatic environment and to develop measures, as appropriate, to prevent pharmaceuticals from reaching the Baltic Sea (MD 2013)	The implementation will be significantly advanced, but the action should remain in the new BSAP. May be specified based on new knowledge.	3 (based on the ongoing projects further recommendations can be given on collection of data as well as specific measures could be proposed) Lead country
Develop common indicators and associated targets related to quantities, composition, of marine litter, including riverine inputs, in order to gain information on long-term trends (MD 2013)	The implementation will be significantly advanced, but the action should remain in the new BSAP. May be specified based on new knowledge.	2
Initiate joint activities to address transboundary nutrient inputs from non-Contracting Parties according to the HELCOM nutrient reduction scheme (MD 2013) (Implementation by 3/9 countries)	Evaluation can be done by PLC and RedCore DG, move to regional actions.	2 (specification of possible joint activities could be added) Lead country

**Commented [A1]:** FI: The answers represent Finland's initial view and they are to be used only for screening purposes. Finland reserves the right to further comment the summary/future versions made by the Secretariat

**Commented [A2]:** FI: ok

**Commented [A3]:** DK agrees to the comments from PRESSURE that it should remain and that there is a need for rephrasing. Especially in the light of the newly published Commission strategic approach for reducing pharmaceuticals in the environment. Unfortunately we do not have time to take a lead on this.

**Commented [A4]:** DE: Germany in cooperation with CG PHARMA (to be confirmed after the next CG PHARMA meeting)

**Commented [A5]:** DK: We agree.

**Commented [A6]:** FI: ok, definition of marine litter?

**Commented [A7]:** SE: Appear to be some distance from achieving this. Particular differences concerning beach litter. Riverine inputs not yet covered by routine monitoring: requires substantial development work [in my own opinion]. EN-ML should be tasked with this specifically, or else it needs to be included into the RAP-ML

Implementation of this will have cost implications for e.g. flodmynningsprogrammet / PLC annual Important to align with ongoing EU processes and ongoing indicator development and prioritization in Helcom GEAR/STATE

**Commented [A8]:** FI: ok

National actions: Categorization of national actions with regard to need for rephrasing in case of transfer to the updated BSAP

Action (origin)	Comment from Pressure 9-2018	Categorization/Need for rephrasing
<b>Not accomplished</b>		
Progress towards reaching of country-wise allocated nutrient reduction targets (CARTs) to diminish nutrient inputs to the Baltic Sea to the maximum allowable level: <b>Phosphorus</b> (BSAP)	No need to report; Assessment is done by PLC and RedCore.	2 (adjust the wording based on the 2018 Ministerial Meeting re. ceilings) RedCore
<b>Partly accomplished</b>		
National programmes to achieve nutrient reductions (BSAP) (Implementation by 5/9 countries)	Should be specified in the updated BSAP.	3 (amended based on the common interpretation) Lead country
Evaluation of effectiveness of national programmes for reduction of nutrients and need for additional measures, in order to reach the country-wise reduction targets (BSAP)	Should be also specified in the updated BSAP and probably merged with the previous one.	2 (update of wording needed e.g. reference to ceilings) Lead country

**Commented [A9]:** FI: ok

**Commented [A10]:** SE: Include dates for when these updates will be produced.

**Commented [A11]:** FI: ok

**Commented [A12]:** DE: Germany

**Commented [A13]:** SE: Potentially, could be worded along the lines of "National Programmes of Measures and Implementation Plans describing sufficient measures, and their timing, to achieve BSAP targets." Could SE lead this work?

**Commented [A14]:** FI: ok

**Commented [A15]:** SE: Development of activity in HELCOM Action? Could be result of BNI trend/gap analysis

**Commented [A16]:** DE: Germany

Action (origin)	Comment from Pressure 9-2018	Categorization/Need for rephrasing
(Implementation by 4/9 countries)		
Progress towards reaching of country-wise allocated nutrient reduction targets (CARTs) to diminish nutrient inputs to the Baltic Sea to the maximum allowable level: <b>Nitrogen</b> (BSAP) (Implementation by 1/9 countries)	No need to report; Assessment is done by PLC and RedCore.	2 (adjust the wording based on the 2018 Ministerial Meeting re. ceilings) <b>RedCore</b>
Target the elimination of phosphorus in laundry detergents for consumer use as soon as possible, but not later than by 2015 (MD 2010) (Implementation by 8/9 countries)	To follow up. It can be further developed including other users of detergents e.g. industrial users or dishwashers for the updated BSAP.	- accomplishment of the action is pending the implementation by Russia; 3 (possible development of the action) <b>Lead country</b>
Enhance the recycling of phosphorus (especially in agriculture and wastewater treatment) and to promote development of appropriate methodology (MD 2013) (Implementation by 3/9 countries)	Put on hold pending elaboration of the regional strategy on P- recycling.	3 (the action will be specified by a future Baltic Sea nutrient recycling strategy) <b>Lead country</b>
Establishment of chemical product registers to be built upon e.g. the EU REACH (EC1907/2006) framework (2010) (BSAP) (Implementation by 6/9 countries)	To follow up.	1
Ratification of the UNEP 2013 Minamata Convention on Mercury (BSAP) (Implementation by 7/9 countries)	To follow up. It can remain in the updated BSAP in a new wording.	1 (no changes if it is not implemented)
Agree to develop in 2008 specific efficiency requirements and emission limit values for small scale combustion appliances in relation to HELCOM Recommendation 28E-8 (BSAP) (Implementation by 3/9 countries)	To follow-up and keep as it is.	2 (decision on a date is needed) <b>Lead country</b>
National programmes to eliminate hazardous substances (BSAP) (Implemented by 6/9 countries)		3 <b>Lead country</b>
Evaluation of effectiveness of national programmes to eliminate hazardous substance (BSAP) (Implementation by 5/9)	Should be specified in the updated BSAP.	3 <b>Lead country</b>
Elimination of remaining hot spots from the JCP List		2 (e.g. decision on deadlines needed) <b>Secretariat to draft</b>

Commented [A17]: FI: ok

Commented [A18]: SE: OK

Commented [A19]: FI: ok (target year)

Commented [A20]: SE: OK. Should be relatively trivial if it involves checking Russian implementation and if "elimination" = the current EU /Helcom limits. Further reductions may be difficult to justify (some 10s of tonnes P).

Commented [A21]: DE: Possibly DE but not confirmed yet

Commented [A22]: SE: FI leads this work at present...

Commented [A23]: FI: Category ok, FI offers to lead

Commented [A24]: DK: OK to follow this up. In DK we already have a chemical product register.

Commented [A25]: FI: ok

Commented [A26]: SE: OK with follow-up, but perhaps a more proactive approach is needed, including exchange with e.g. OSPAR Dynamec to identify substances of concern before they are adopted by REACH / Priority Subs directive etc

Commented [A27]: FI: ok

Commented [A28]: DK: OK to keep until all countries have implemented the Minamata Convention.

Commented [A29]: SE: Will this not be ready by adoption of update BSAP?

Commented [A30]: FI: Cat 3 proposed: emissions of small scale combustion can ot be monitored and the recommendation could be formulated to more strongly encourage or oblige to use BAT

Commented [A31]: DE: Germany

Commented [A32]: DE: Germany

Commented [A33]: FI: ok

Action (origin)	Comment from Pressure 9-2018	Categorization/Need for rephrasing
(municipal and industrial) (MD 2013)		
Implementation of the UNEP 2013 Minamata Convention on Mercury (MD 2013)	The implementation has not been assessed	2 or 3 (if there is a need for regional support of the implementation) <b>Lead country</b>

Commented [A34]: FI: category 2 ok