



Baltic Marine Environment Protection Commission

Tenth Meeting of the Working Group on Reduction of Pressures from the Baltic Sea Catchment Area

PRESSURE 10a-2019

Online, 21 May 2019

Document title	Concretization of existing commitments from BSAP and MD 2010 and 2013 that are not included in the follow-up system
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Agenda Item	2-Follow-up of HELCOM actions
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Submitted by	Secretariat
Reference	

The document has been revised by adding comments from Germany.

Background

The implementation of existing HELCOM actions, including from the current BSAP and Ministerial Declarations in 2010 and 2013, have been followed-up through a coherent scheme since 2016. Some actions were however evaluated as too generically formulated to be followed-up. As agreed through the Strategic Plan for the BSAP update, these actions should be reviewed to check if some of them should be considered for uptake in the updated BSAP and in that case to concretize them in a similar way as outlined for paragraphs of the 2018 Ministerial Declaration. PRESSURE 10-2019 agreed on a written procedure to provide comments for the follow-up of actions previously deemed too general ([document DS-10](#) of PRESSURE 10-2019).

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 actions that could be transferred to the updated BSAP and their categorization.

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

Existing commitments that are not included in the follow-up system

Action	Inclusion into updated BSAP (yes/no/category)	Justification/leadership
Review of BSAP environmental targets - this process should also aim for further regional differentiation of the targets, in particular in the coastal zone, with the view to seek coherence between open sea and coastal waters targets	FI ¹ : ? DE: Yes, 3	SE: Isn't this something that should be a constant process? The task is too big for one CP to lead. Or assign to relevant WG:s to revise DE: Should be merged with action on cooperation with river basin authorities; aim should be to harmonise WFD and BSAP reduction targets but not to derive new BSAP or WFD reduction targets
Periodical review and revision of maximum allowable inputs and nutrient reduction requirements using harmonised approach and updated information	FI: yes/1 SE: 1-2 DE: Yes 2	SE: We lack a rigorous science-based critique of the current scheme that could guide the future development. Pressure has had ideas (climate, coast/offshore, downscaling), but nothing systematic with implications. For example JRC? RedCore/BNI? DE: Remains an important task since better data might become available
Actions to reduce nutrient load shall be undertaken	FI: no SE: 3	FI: self clear, realizes by the other content of BSAP SE: General. Presently too vague – everyone can say fulfilled with a minimum of effort. It also lacks regional added value. Can be more concrete: <i>“Actions to reduce nutrient</i>

¹ 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.

	DE: Yes 3	loads to MAI will be implemented by 202x. CPs commit to report the number, magnitude and effect of their implemented measures.” DE: Important but needs to be specified and related to specific measures and actions
Jointly address common challenges, including through sub-regional and bilateral projects, as well as develop additional reduction measures as needed based on cost-efficiency	FI: no SE: 3 DE: no	FI: -“- SE: General. A worthy aim, but needs to be concrete. Is this just about nutrients, or wider? This affects choice of leadership. DE: Too general, better to suggest concrete measures
Facilitate exchange of information on best available treatment techniques (WWTP), including showcasing of best examples (“List of Green Baltic Spots”)	FI: yes/cat 3 SE: 2 DE: yes 3	FI: could be formulated in general level: intention of facilitating exchange of information SE: Good. Needs to be concrete. E.g. develop a prize for the most effective WWTP in different size categories (a bit like the Baltic Farmer award with BFFE – perhaps sponsored by EurEau?) DE: Exchange of information not sufficient, add concrete measures to improve WWTPs
Launch pilot activities regarding municipal waste water treatment by engaging a wider network of municipalities, and where appropriate enhancing co-operation in environmental field under the EU Strategy for the Baltic Sea Region (for those CPs that are EU MS)	FI: yes/cat 3 SE: 2 DE: yes 2	FI: EUSBSR to be included in a cross cutting way as an instrument/platform to launch joint pilot activities SE: “Race for the Baltic: City Accelerator” has initiated work. This needs to be recognised and incorporated into this objective DE: This is one of the important work areas of the EUSBSR; could be made more concrete

Encourage educational cooperation and exchange of best practices and experiences of solving the problem of municipal sewage in smaller municipalities and scattered settlements	FI: yes/cat 3 SE: 2 DE: yes 3	FI: could be formulated in general level SE: See Race for the Baltic... DE: Scattered dwellings remain an important source of nutrient inputs in some CPs, so concrete measures should be included in updated BSAP
Encourage voluntary use of P-free dishwasher detergents	FI: yes/cat 3 SE: 2 DE: yes 3	FI: to be combined with the possible rec for elimination of phosphates in dishwasher etc. detergents SE: Unlikely to have negative consequences (although involves higher temperatures and shorter life for glassware etc) but need to have an estimate of actual potential. DE: Develop a new action on P-free detergents taking into account current EU legislation and what could be done as voluntary commitments in addition Lead: potentially Germany, but needs to be confirmed
Transboundary pollution originating in the non-Contracting States to be addressed by joint activities e.g. by bi- and/or multilateral projects, other existing funding mechanisms and international agreements such as the 1992 UNECE Convention on Transboundary Waters and Lakes, and the RBMPs of the EUWFD, for HELCOM Contracting States being also EU Members	FI: yes/cat 2 SE: 2 DE: yes 2	FI: other fora not to be specified SE: This is fine as is, but could do with being made SMART. Would benefit by being led by a CP with significant transboundary issues. DE: Remains an important action, check whether it needs to be updated
List of priority installations contributing to transboundary pollution of the Baltic Sea	FI: no/cat 3 SE:2 DE: yes 1 or 2	SE: Needs to be SMART
Governments of the HELCOM Contracting Parties shall make use of the assessments of the inputs and effects of airborne nitrogen to the Baltic Sea in the revision of the emission targets for nitrogen under CLRTAP	FI: no SE: 3	SE: When are the next CLRTAP revisions planned? CPs make use of the current guidance (commissioned

	DE: Yes 1 or 2	by HELCOM & OSPAR). Lower priority at present, but shouldn't be lost completely in case N-load targets look like being missed. DE: There is a similar action in OSPAR NEAS, compare the text
Address the need for additional measures within transportation, combustion and agriculture (as the three major sources of atmospheric emissions of nitrogen these sectors) with the aim to ensure a Baltic-wide application of uniform standards	FI: yes/cat 3 SE: 3 DE: yes 3	SE: This needs clarification. Was the intention to do some form of CBA in order to find optimum reduction levels from each of the sectors in combination, or separately? This could be very complex – particularly as the ammonium (agriculture) releases behave differently to the emissions from combustion and transportation (NOx). DE: Important to address these sectors as major sources of nutrient inputs but better to formulate more concrete actions
Monitor and evaluate regularly the progress in implementing the measures (for nutrient reduction to reach CART)	FI: yes/cat 2 SE: 2 DE: yes 2	SE: Time line is currently missing. state when the CART results will be updated. Currently managed by RedCore with the operational work done by BNI & Aarhus Univ. DE: Relate to implementation of nutrient input ceilings
Identify and prioritize the remaining investment needs for further reduction of nutrients, with the aim to bridge the gap in translating HELCOM nutrient reduction targets into area or site specific implementation and thus strengthen local contributions towards regional goals	FI: yes/cat 2 SE: 2	SE: Potentially very useful, but need to identify the product that will incorporate this delivery. This needs a great deal of reanalysis of PLC Periodical data (and it's not clear that

	DE: 1 or 2	subs to the atmosphere, not the transport. This should be in two parts – to address emissions from CPs, and then to address emissions affecting the Baltic from outside the convention area. DE: Better to reformulate using “airborne emissions”
Promote and continuously support actions aiming at changing e.g. consumer behavior towards “greener” (less associated with use of hazardous substances) products, processes and services	FI: yes/cat 2 SE: 3 DE: yes 3	FI: to be formulated in a more general level SE: Needs further development as to what activities were intended DE: Refer to the outcome of Non Haz City-Project, could be extended to other pressures such as litter and nutrient inputs
Encouraging continued research on hazardous substances of specific concern to the Baltic Sea, including on their interactions and cumulative effects as well as source reduction measures and development of cost-efficient end-of-pipe solutions	FI: yes/cat 2 SE: 1 DE: yes 2	FI: to be combined with other general research needs SE: The link to BONUS and EUSBSR is good. DE: Rephrase and separate measures from effects
Assessing the need for joint measures to reduce emissions and discharges of hazardous substances	FI: yes/cat 2 SE 3	FI: to be formulated in a more general level SE: Should be developed further. Is this the HOLAS assessment (distance to target for status) which indicates the need, an analysis of PLC Annual data to identify loads, a PLC-Haz Periodical assessment like the source oriented nutrient studies, or some other as yet undetermined analysis? We think a strategy is needed which helps prioritizing actions where

	DE: yes 1-2	Helcom work is beneficial as compared to other fora
Making use of information generated by REACH Regulation, EU WFD and EU MSFD, e.g. substance-specific risk assessments and dossiers, etc.	FI: no SE: 2 DE: yes 1	FI: self evident SE: Good. Interaction with OSPAR LCPA/LSPC work would be good too.
Raising the awareness of the public regarding the effects on human health and the environment of hazardous substances	FI: yes/cat 2 SE: 1 DE: 1	FI: to be combined with other general aims
Capacity building within and between authorities as well as for industries on the identification and implementation of requirements concerning hazardous substances	FI: yes/cat 2 DE: yes 1	FI: -"-
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	FI: yes/cat 2 SE: 1" DE: yes 2	FI: -"- DK: This commitment is already covered by the existing regional action plan on marine litter. DE: Update according to RAP ML
Further investigate possibilities for the substitution of the use of polyphosphates as builders in dishwasher detergents for consumer use	FI: no SE: see earlier DE: yes 3	FI: to be combined with the proposed rec DE: Develop a new action on P-free detergents taking into account current EU legislation and what could be done as voluntary commitments in addition Lead: potentially Germany, but needs to be confirmed
Carry out further investigations on alternative builders in detergents, especially on their use and environmental effects	FI: no SE: see earlier DE: yes 3	FI: to be combined with the proposed rec DE: Reformulate, potentially considering not only phosphate but also other substances Lead: potentially Germany, but needs to be confirmed

Further assess in cooperation with the BALTEX community, the current and predicted effects of climate change on the pressures affecting the marine ecosystem	FI: yes/cat 2 SE: Completed through the creation of EN-CLIME DE: yes 2	FI: Partners not to be specified SE: Alternatively "continue cooperation with the BALTEX* Community" (*now Baltic Earth). DE: Update concerning the current processes in HELCOM and work of EN CLIME
Follow up the progress in hot spots remediation and support exchange of information and knowledge especially on application of BAT for remaining industrial hot spots	FI: yes/cat 2 SE: 1 DE: yes 1	FI: to be concerned to all hot spot categories
Start work on strict restrictions of use for perfluorooctane sulfonate (PFOS), nonylphenol/nonylphenoethoxylates (NP/NPEs), short-chain chlorinated paraffins (SCCPs)	FI: yes/cat 3 SE: 3 DE: yes 3	FI: a more general formulation, substances not to be specified SE: This work is well advanced now. Refine and rephrase. DE: Update according to international processes
If relevant assessments show the need, initiate adequate measures for medium-chain chlorinated paraffins (MCCPs), octylphenols (OP)/Octylphenol ethoxylates (OPE), perfluorooctanoic acid (PFOA), decabromodiphenyl ether (decaBDE) and hexabromocyclododecane (HBCDD) (2009)	FI: yes/cat 3 SE: 3 DE: yes 3	FI: a more general formulation, substances not to be specified SE: This work is well advanced now. Refine and rephrase. DE: Update according to international processes
Application of strict restrictions on the use of mercury in products and from processes and support the work towards further limiting and where feasible totally banning mercury in products and from processes (BSAP); to start checking by 2011/12 the feasibility of reducing and avoiding the use of mercury in products and from processes as well as further reducing mercury emissions, e.g. from large combustion sources (MD 2010)	FI: no SE: 3 DE: yes 3	FI: self evident SE: Old. Should be revised to reflect Minamata Convention DE: Update according to international processes
Input to international forums to influence work on hazardous substances (e.g. revision of BREFs, WFD, REACH, plant protection and biocides regulation, etc.)	FI: no SE: 2 DE: yes 3	FI: self evident SE: Make SMART. Include cooperation with OSPAR, AMAP etc.
Promotion and support of identification and inclusion of new candidate substances to Stockholm POPs Convention and CLRTAP Aarhus Protocol	FI: no SE: 1	FI: self evident

	DE: yes 1	
Promotion of and participation in Strategic Approach on International Chemicals Management (SAICM) implementation process	FI: no SE: 1 DE: yes 1 or 2	FI: self evident SE: Make SMART DE: Update according to international processes