

WE ARE THE BALTIC!

Civil Society Declaration on Ecosystem Health of the Baltic Sea



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Helsinki Convention – HELCOM (1974/1992), one of the oldest regional sea conventions has entered in 2007 into its new development cycle with the Baltic Sea Action Plan (BSAP), being truly based on the ecosystem approach. Previous HELCOM cycles have addressed sea-based and land-based sources of pollution with sufficient funding invested into environmental improvements in respective fields.

In 2017 it became evident that despite ambitious goals and global leadership, the BSAP progress has slowed down and most of the problems identified 40 years ago are still there, while political commitment, willingness and resources to solve those have substantially diminished.

Studies and reports have also warned for socioeconomic effects of a continued ecological deterioration of the Baltic Sea that drive regional economy far away from a sustainable Blue Economy path.

Residents of all Baltic Sea catchment countries are very disappointed of the current state-of-play, and the Sea itself, that suffers under heavy environmental and pollution load, protests loudly!

We have a plan, we need committed leadership!

On behalf of grass-root environmental NGOs from the Baltic Sea Region, **WE** the undersigned representatives of the civil society **EXPRESS** our serious **CONCERNS** on the lack of progress towards reaching Good Environmental Status as envisaged by the HELCOM Baltic Sea Action Plan (2007).

WE REGRET that after ten years of implementing the pioneering and ambitious Marine Regional Environmental Action Plan, and only three years short of the date when the recovery should have been achieved for most measures, the Ecosystem Health of the Baltic Sea ecosystem remains highly unsatisfactory. In fact, in certain cases the situation has even further deteriorated, as confirmed by the Second HELCOM's Holistic Assessment (State of the Baltic Sea Report, 2017).

WE BELIEVE that HELCOM should choose another road to more effectively protect the Baltic Sea environment and ecosystem. HELCOM should have a process, where identification of problems leads to development and implementation of more concrete and targeted actions that more successfully can reach the set up goals. This has been the working method for HELCOM for many years, and would still be the best pragmatic way to continue, instead of deviating the focus from solving major well known problems to “mushrooming” of further knowledge gathering without clear objectives and funding for implementation of actions in practice.

WE STRESS that the BSAP progress should be evaluated by quality and not the quantity of undertaken actions. Setting new regulations is meaningless, when actual achievements are still possible through implementing local, smarter and low-hanging measures in reaching the goals, as demonstrated below.

WE HIGHLIGHT that EU law that was seen as one of primary tools for reaching BSAP targets became a hindrance in implementing stricter HELCOM provisions (e.g. in agriculture, sewage treatment, etc.), as correctly pointed out by the EU Court of Auditors in 2016.

WE WARN that stamping HELCOM commitments as legally non-binding for the Contracting Parties makes clear the intentions of national governments as not willing to move forward in a coordinated way and impossible to push for implementation at national level.

WE MUST UNDERLINE the institutional problems with unclear mandates and dual control on cross cutting issues, indeed most measures linked to biodiversity, fisheries and agriculture. An ecosystem based approach is cross sectoral by nature and if competences are not combined or if a clear mandate is not given to one body or authority to lead, progress will take one step forward and two steps back. HELCOM can regain the forerunner position and become a model region for water and sea management only if it truly applies the ecosystem based management throughout its all actions in deeds and not just words!

WE, the residents of the BSR, represented at municipal, regional and other levels **ARE STRONGLY COMMITTED** to saving our precious Baltic Sea and with moral as well as financial support from the Contracting Parties and the EU, **WE WILL BECOME ACTORS OF CHANGE**, running innovative projects and continuing to work for a healthy Baltic Sea.

We ask HELCOM Contracting Parties to follow jointly the agreed commitments!

To facilitate this process WE also COMMIT ourselves to focus before 2021 and beyond to support the following actions towards the Good Environmental Status of the Baltic Sea.

In Eutrophication segment

- BSAP nutrient reduction targets/ceilings should be translated into river-basin and site-specific nutrient commitments, to be understood and implemented by local actors
- Revision of Part II of [Annex III of the Helsinki Convention](#) (1992) should be accomplished and enforced with the following main assumptions:
 - Introduce mandatory nutrient soil-mapping, nutrient bookkeeping and nutrient balance calculations at field level to become a mainstream in Baltic agricultural and food production systems, and hence a pre-condition for allocating agricultural subsidies;
 - Fulfil until 2019 the [HELCOM 2013](#) ambitions and introduce national tolerable N-surplus level, preferably of 20-40 kg Tot-N/ha, and a tolerable P-surplus of zero (0) kg Tot-P/ha (or negative surplus in areas with substantial P-surpluses), for all agricultural lands provided with fertilizers;
 - include industrial horse, goat, sheep and fur farming, along with industrial rearing of cattle poultry and pigs in the Annex III, part 2 of Helsinki Convention to be addressed by HELCOM both in terms of BAT for reducing nutrient inputs and emissions of greenhouse gases.
- Adequate and economically reasonable sewerage connections to private households should be accomplished in cases, where new waste water treatment facilities have been constructed; when new WWTPs are planned to be built an efficient public money spending should be secured through smart combination of municipal sewerage networks and individual household solutions
- Targets for improvement of level of rural and individual housing sanitation should be established across the BSR in accordance with the BSAP (2007) and HELCOM Recommendation [28E-6](#)

In Hazardous substances segment

- Following good [examples](#), the Contracting Parties should set bans on microbeads in Personal Care Cosmetic Products. The industry at large is already prepared for this. Also the use of micro plastics as abrasives for e.g. mechanical blasting on shipyards should be banned.
- Employment of reusable packaging for “to go-products” like coffee should become obligatory
- Rubbish bins along beaches, hiking trails and bridges should be improved by providing closed, animal-proof lids and more regular emptying during high season. Measures have to be implemented to reduce input of cigarette butts, e.g. information signs or additional collecting boxes at frequented beaches.
- Responsibility of industrial sector in preventing packaging material blow-away in the vicinity of water bodies, e.g. application of waste containers with closed lids should be improved and enforced
- “No-special-fee system” should become true for mandatory discharge of ship garbage in all ports.
- Waste collection and disposal of [pharmaceutical residues](#) should become mandatory in all CPs, coupled with Extended Producer’s Responsibility and wide public awareness in off- and online pharmacies and healthcare institutions
- HELCOM Recommendation [28E-5](#) should be revised to ensure efficient treatment of micro-pollutants that could be provided both by hi-end tertiary treatment, as well as low-cost measures with synergistic effects, e.g. [constructed wetlands](#).
- Storm-water collection and treatment systems should be improved to enable efficient trapping of various pollutants, including nutrients, microplastics and pharmaceuticals; HELCOM Recommendation [23-5](#) should be revised to fit for purpose of the [HELCOM RAP ML](#)
- Further measures should be devised by HELCOM to reduce inputs of mercury to the Baltic Sea, aiming at revision of already existing [HELCOM actions](#), also in line with Minamata Convention, e.g. addressing incineration and combustion from various sources.
- Contracting Parties should improve hazardous substances management at local level, e.g. through introducing green procurement practices for municipal needs.

In Biodiversity and nature conservation segment, including fisheries-related actions

- MSP should become truly ecosystem-based management tool, where nature protection values prevail over economic interests, and when it is implemented in the same way across the BSR, e.g. in case of Protected Areas designation vs. large infrastructure projects – would it be at sea or in the catchment.
- Marine protected areas all over the Baltic Sea are missing relevant management for the species and habitats they were designated for. Contracting Parties need to step up efforts to create and implement effective management plans for marine species and habitats, in all MPAs in their waters.
- All HELCOM states must acknowledge the dire situation of the Baltic Sea harbour porpoise population and move this species up to the top of the list of priorities. Research is good, but not at the cost of immediate action. If we do not do something now we will lose the Baltic harbour porpoise forever. At least the following actions should be implemented:
 - Enforce use of pingers on set gill-nets in the entire Baltic Proper at least until there are clear results from EU MSFD bycatch monitoring
 - Put in place strict threshold levels for the emission of impulsive underwater noise in the entire Baltic
 - Phase out bottom-trawling and make sure the ecosystem can sustain its top predators
- Baltic Sea states should follow global [SDG14](#) targets to end overfishing, IUU fishing and destructive fishing practices and prohibit harmful fisheries subsidies by 2020. At the BSR level it should mean:
 - drastically restrict cod fisheries, especially when Western Baltic cod is already at the edge of collapse and general size-age distribution of the Baltic cod is severely impaired
 - channel public funds to phasing-out cod bottom-trawling practices with poor selectivity, and promoting a shift to more selective fishing gear such as cod-pots
 - ban fishing of the critically endangered European eel in the Baltic Sea and Kattegatt immediately and until further notice, develop resources to continuously remove illegal fishing gear along the coast of Sweden, Denmark, Germany, Poland that catch eel and share best practice on up- and downstream migration hindrance mitigation etc.
 - Contracting Parties have to minimize unwanted catches in fisheries both for depleted fish stocks and the critically endangered Baltic Sea harbour porpoise. As stated in EU MSFD, a sufficient bycatch monitoring of the fishing fleet should be set, to estimate bycatch rate.
 - comprehensive Salmon River Management Plans for at least one weak wild-salmon river in Sweden, Russia, Estonia, Latvia and Lithuania should be developed by 2019, to reach active protection in 2020, in accordance with BSAP (2007).
 - use of public funds to support businesses etc. must be steered towards the BAT and best performers to drive constant improvements, e.g. regarding support to aquaculture operations, fishing gear development.

In Maritime activities segment

- Baltic ports should address other, earlier considered negligible sources of pollution, e.g. through implementation of BAT for [ports facilities handling fertilisers](#) to avoid losses of nutrients during loading operations.
- New knowledge on the impact of underwater noise on biota and especially on endangered species indicates requirements of additional management measures to avoid impact of shipping, e.g. changing deep-sea routes in the vicinity of offshore MPAs
- Pile-driving, trenching and pipe-/cable-laying processes should be limited during periods when marine mammals are susceptible to noise impacts, i.e. during mating, breeding and nursery.
- Contracting Parties should re-assess environmental impacts of recreational boating sector e.g. noise, waste collection for oil, sewage and litter in marinas and archipelago areas and address those by enforcement of existing regulations or revision of relevant HELCOM recommendations.
- All Contracting Parties should have national guidelines on mitigation and accepted thresholds of underwater noise during maritime construction. Echo depth sounder on commercial and recreational ships should introduce automatic turn-off (in deep areas) and turn-on (in shallow areas) of wavelength < 50 Hz at installed eco-sonar, as soon as possible, to minimise disturbances for the threatened Baltic harbour porpoises.

In Development of assessment tools and methodologies

- Joint HELCOM monitoring and assessment system should set stricter requirements on submission and quality assurance of national data, as its credibility for decision-making purposes is at stake if important data is constantly missing for one or several Contracting Parties
- Contracting Parties should ensure sufficient reporting on implementation of jointly adopted obligations and commitments for evaluation of efficiency of undertaken measures and setting necessary corrections.
- Joint efforts should be made to improve data and [knowledge of recreational fishing in the BSR](#) by streamlined data collection and catch reporting, for example using smart phones to be able to assess impacts and also economic value of the recreational sector
- To efficiently address sources of litter and micro-particles in the Baltic Sea watershed, a harmonised methodology for monitoring of such riverine inputs needs to be developed and integrated into pollution load compilations for other major contaminants.

In Awareness raising and capacity building

- Contracting Parties should ensure public participation in the decision-making process, as well as transparency and accountability of public authorities in all relevant cases, ranging from EIAs and permitting procedures to allocation of public money.

In Financing segment

- To avoid that agreed obligations and commitments are not accomplished due to lack of resources, HELCOM decision-makers must identify and secure funding to support implementation.
- With due respect to fundamental principles of Helsinki Convention, Contracting Parties should ensure that the damage producing entity pays for environmental harm irrespective of the sector (industry, maritime business, agriculture and fisheries). Hence, public subsidies should only be allocated to delivery of healthy and sustainable environment as a public good for subsidies received, which is currently not the case in Baltic agriculture and fisheries.
- To address this issue in case of eutrophication and agriculture, HELCOM Contracting Parties should agree to use 30-40 % of total financing from agricultural support schemes, such as EU CAP RDP, for measures to reduce nutrient pollution from agriculture sector to waters and the Baltic Sea, as adopted by [2013 HELCOM Ministerial](#) and contained in Part II [Annex III of the Helsinki Convention](#).
- Regional financial institutions should re-consider the term ‘sustainable investments’ to ensure that environmental pillar of sustainability, especially in the BSR context, is not overtaken by purely economic short-term considerations, e.g. just boosting agriculture or aquaculture production.
- Public money should never be spent on environmentally questionable projects (e.g. by investing into curbing internal loads and at the same time promoting pig production); it is time to implement nutrient divestment, when funders avoid/withdraw eutrophication-generating assets

Summing up, at this stage with only a few years left before the original BSAP deadline in 2021, HELCOM Contracting Parties should strongly focus on implementation of already agreed commitments, instead of shifting the deadline towards 2030, relying on SDG process to solve all the Baltic problems.

The 2018 HELCOM Ministerial Meeting will demonstrate whether the countries are consent with 1992 Helsinki Convention that “protection and enhancement of the marine environment of the Baltic Sea Area are tasks that cannot effectively be accomplished by national efforts alone”.

We call on each BSR country to hear their citizens' demands on saving the Baltic!

To foster the BSAP implementation, **WE RECOMMEND** the following national actions to be accomplished:

...in Denmark

- Further limit nutrient losses from agricultural lands by avoiding nutrient surplus
- Focus aquaculture on best available technology and land based solutions only
- Halt unsustainable fishing practices, especially for cod and eel, and phase out unselective trawl gears
- Follow the precautionary principle and do not allow extra nutrient reduction accounting to be used for purposely increasing inputs to the Baltic Sea basin

...in Estonia

- Introduce mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar for livestock installations and intensively used farmland

...in Finland

- Reintroduce salmon in former wild salmon rivers.
- Focus aquaculture on best available technology and land based solutions only
- Introduce mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar for livestock installations and intensively used farmland

...in Germany

- Stop catching undersized ("baby") cod. End eel fishing. Phase-out bottom-trawling and fisheries with poor selectivity before 2020
- Diminish bird and mammal bycatch of gillnet fisheries; phase out such fisheries where necessary for the adequate management of protected areas
- Fulfil and strengthen the requirements for mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar for farmland
- Reduce airborne and manure-sourced nutrient and GHGs emissions from livestock installations
- Implement the „Yellow Bin“ instead of „Yellow Bags“ in municipalities close to the Baltic Sea to make the waste collection animal proof

...in Latvia

- Develop a national plan to safeguard the 10 rivers with wild salmon populations, including removal of obsolete dams (e.g. Staiceles Dam on the Salaca River, which impedes salmon spawning);
- Following Sloka case in 2017, strengthen control of transboundary shipment of municipal solid waste;
- Complete the rehabilitation of HELCOM hotspots and contaminated sites (e.g. Inčukalna tar pond);
- Introduce mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar for livestock installations and intensively used farmland

...in Lithuania

- Stop catching undersized ("baby") cod. End eel fishing. Ensure active protection of weak salmon populations.
- Introduce mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar

...in Poland

- Phase-out bottom-trawling and fisheries with poor gear selectivity before 2020
- Introduce HELCOM Annex III, part 2 requirements for proper manure storage at livestock installations, mandatory nutrient bookkeeping and tolerable nutrient surplus levels per hectar
- Refrain from plans on significant modifications of Vistula and Odra river systems for inland navigation purposes; refrain from making navigation canal across the Vistula Spit and Lagoon
- Implement bycatch mitigation measures such as pingers, in all gillnet fisheries, and large-scale bycatch monitoring to assess the impact of bycatch on the Baltic Sea harbour porpoise population

...in Russia

- Introduce requirements for proper manure storage at livestock installations, introduce mandatory nutrient bookkeeping, nutrient-balanced calculations at field level and tolerable nutrient surplus levels per hectar

- Develop a comprehensive Luga river salmon management plan until 2019
- Ensure waste water treatment and sewage sludge handling in all towns and settlements within Baltic Sea catchment at the levels specified in HELCOM recommendations [28E-5](#), [28E-6](#) and 38-1
- Ensure sufficient capacities for collection, storage and safe disposal of waste as specified in HELCOM recommendation [31E-4](#)

...in Sweden

- Stop catching undersized ("baby") cod. End eel fishing. Phase-out bottom-trawling and fisheries with poor selectivity before 2020
- Develop comprehensive Salmon River Management Plans for the weak wild salmon rivers of Emån and Mörrumsån, the only rivers that belong to the South-west wild Baltic salmon group, with unique genetics, by 2019, to reach active protection in 2020
- Introduce mandatory nutrient bookkeeping, primarily in areas with high animal density and intensive agricultural production. Introduce tolerable nutrient surplus levels per hectare, out from mandatory nutrient-balance calculations at field level.
- Ensure strict protection of the most important areas for the Baltic Sea harbour porpoise

...in the European Union

- Establish EU-wide limits for P-fertilisation on farmland (complement the Nitrate Directive with phosphorus limits), to be primarily applied on agricultural areas with phosphorus surpluses
- Implement the recommendations of the Special report of the EU Court of Auditors: Combating eutrophication in the Baltic Sea: further and more effective action needed ([2016](#)), especially those related to coherent implementation of EU Water Framework, Urban Wastewater Treatment and Nitrates Directives with the goals and targets of the HELCOM BSAP.
- Secure full implementation of the EU WFD (by adopting River Basin Management Plans to meet the HELCOM BSAP targets), and MSFD, as the most important instrument to reach the eutrophication goals of the BSAP, via strong pressure on EU Member States within the BSR
- Introduce EU fertiliser trade legislation, to facilitate trade of recycled organic fertilisers, to minimize fertiliser import and develop nutrient-balanced European regions
- Introduce EU CAP financial support systems that promote livestock production which balances animal density with agricultural land by greater proportion of local feed production, optimised manure handling, nutrient-balanced fertilization practices and reduce the risk for nutrient losses.
- Reduce income support (Pillar I) and increase payments for public goods, e.g. via RDP (Pillar II), for sustainable manure storage and nutrient-balanced fertilisation practices, at field level.

...in Belarus

- Ensure that development of industrial animal farming is coupled with sufficient investments in environmental technologies and preventative practices through the application of BAT
- Address nutrient losses from agriculture by establishing areas critical to nutrient pollution with stricter pollution prevention requirements that should be applied in permitting processes, including nutrient-balanced fertilization practices
- Refrain from plans on significant modifications of Western Bug / Pripyat / Dnieper river system for inland navigation purposes (E40 waterway project)

...in Ukraine

- Strengthen and intensify work on harmonisation of the national legislation with EU environmental law, and its further implementation, with particular focus on waste and wastewater sectors, as well as agri-environmental measures
- Identify priority pollution sources by nutrients and hazardous substances of small rivers within the whole Baltic Sea basin and develop investment programme and concrete proposals for potential donors

...in Czech Republic

- update Odra River Basin Management Plan and respective Programme of Measures to effectively reduce nutrient losses from agriculture and water pollution from industries to the Baltic Sea
- Refrain from plans on significant modifications of Odra river system for inland navigation

We need to keep the strength and ambition of the Baltic Sea Action Plan after 2021!

With reference to the above, **WE SUBMIT** the following proposals of the citizens of the BSR on important elements that review of the Baltic Sea Action Plan should be based upon:

...in General

- the ambitions of the BSAP should be maintained and strengthened with ecosystem-based management applied across all sectors, and with HELCOM's role as the key player ensured
- the revised BSAP should ensure that the BSR is ready to bear responsibilities for achieving GES without hesitation and stop relying on somebody else's responsibility to coordinate, restructure and move forward!
- climate change thinking should be applied across all BSAP segments to integrate necessary adaptation and mitigation measures based on the most recent scenarios and modelling of implications for specific sectors, e.g. nutrient runoff from agriculture, waste- and stormwater, river basin management, coastal protection, invasive species, etc.

...in Eutrophication segment

- Revised part 2 of Annex III of the Helsinki Convention "Prevention of pollution from agriculture" should be adopted and enforced
- Nutrient input ceilings should be further detailed and specified per country and per river basin, thus allowing local actors to set and reach nutrient reduction commitments contributing to accomplishment of GES with regards to eutrophication
- Nutrient neutrality of industrial or municipal activities should be encouraged and stimulated

... in Hazardous substances segment

- New provisions for advanced municipal waste water treatment should be set to enable effective containment of hazardous substances, including pharmaceuticals and micro-particles
- HELCOM list of priority substances should be reviewed and extended

... in Biodiversity and nature conservation segment

- Long-term survival of the only Baltic cetacean, the Baltic Sea harbour porpoise, should be ensured
- Strict fishing ban on European eel should be enforced until the population sufficient recovery is confirmed by ICES
- Sustainable fisheries management should be truly based on ecosystem approach and GES should become a baseline for setting management measures
- Levels of continuous underwater noise should not be allowed to increase further, but should be decreased through new technology and regulations
- Relieving the abundant oxygen deficiencies in both shallow and deeper water bodies requires cross-cutting measures going beyond current regulations; further efforts based on ecosystem services and functioning should be initiated

... in Maritime activities segment

- Specific focus should be dedicated to sea bed exploitation for various purposes, e.g. large-scale infrastructure development, dredging and mining

... in Development of assessment tools and methodologies

- Only new tasks/initiatives with clear objectives/goals, clear mandate and secured funding for further implementation should be supported

... in Awareness raising and capacity building

- A long-term communication and outreach strategy to make HELCOM's role, knowledge and experiences more visible for regional and local actors should be elaborated and applied

... in Financing segment

- More active and coordinated efforts to secure capacities for implementation are needed across all funding sources, including IFIs, EU programmes and frameworks, national ministries and private sector. Secure major financing from CAP-subsidies to control nutrient leakage from farmland.

Coalition Clean Baltic is a network of environmental NGOs from the Baltic Sea Region:



[Danish Society for Nature Conservation](#)



[Bund für Umwelt und Naturschutz Deutschland, BUND](#)



[Finnish Society for Nature & Environment](#)



[Finnish Association for Nature Conservation](#)



[Estonian Green Movement](#)



[Estonian Water Association](#)



[Ecohome, Belarus](#)



[IPO Ecopartnership, Belarus](#)



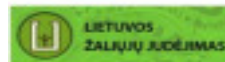
[Environmental Protection Club of Latvia, VAK](#)



[Latvian Green Movement](#)



[Lithuanian Fund for Nature](#)



[Lithuanian Green Movement](#)



[Polish Ecological Club, PKE](#)



[Green Federation - GAJA, Szczecin, Poland](#)



[Friends of the Baltic, St Petersburg, Russia](#)



[Green Planet, Kaliningrad, Russia](#)



[Swedish Society for Nature Conservation](#)



[WWF Sweden](#)



[The Western Center of the Ukrainian Branch of the World Laboratory](#)