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*Coalition Clean Baltic*

**ENVIRONMENTAL NGO (COALITION CLEAN BALTIC AND WORLD WIDE FUND FOR NATURE)  
STATEMENT FOR HELCOM HIGH-LEVEL MEETING ON THE  
HELCOM BALTIC SEA ACTION PLAN  
HELSINKI, FINLAND  
9 MARCH 2011**

On behalf of the environmental NGOs, Coalition Clean Baltic and WWF, who serve as observers to HELCOM, we appreciate the opportunity to address this High Level Meeting to discuss the challenges and review progress made towards achieving the targets of the strategic HELCOM Baltic Sea Action Plan. As you know, we welcomed HELCOM's initiative to launch the BSAP process that was adopted November 2007. The ambitions of the BSAP to deliver wide-scale and decisive actions necessary to achieve a good ecological status for the Baltic Sea were seen by CCB and WWF as an important first step towards achieving a Good Environmental Status and recovery of the Baltic Sea ecosystem. Further, the BSAP process was also seen as a unique initiative to unite the countries around the Baltic Sea in one shared action plan. In practice, however, nearly four years after the BSAP was agreed, there is a surprising lack of progress, concerted initiatives and concrete actions to reduce nutrient input from agriculture, to control the spread of hazardous substances, reduce the impacts from fisheries and to protect biodiversity. In other words, the real work to deliver the BSAP has yet to be done.

CCB and WWF welcomed the initiative of the Swedish Chairmanship of HELCOM to work for regular high-level meetings at a ministerial level given their recognition that the implementation of the BSAP, and the challenges associated with this, demand more regular attention from the highest political level. We are therefore deeply disappointed that Andreas Carlgren, the Swedish Environmental Minister, is not here today to demonstrate that Swedish Chairmanship has also prioritized this at the highest political level. Further, the fact that this meeting lacks the participation of ministers sends a distressing signal that the CPs are not giving the BSAP the priority that it needs. With all due respect to the high-level government representatives present, it is this lack of political will and leadership which today is directly undermining the successful implementation of the BSAP.

Fortunately, we are pleased to note that there are some important areas of progress in the BSAP. This includes the building and upgrading of waste water treatment plants around the region, the ongoing designation of the Baltic Sea as a Special Area for sewage under the MARPOL Convention and the assessment of wild Baltic salmon populations. These examples illustrate the benefit of cooperation under the BSAP and should be leveraged so as to extend into other segments where joint concerted action is needed.

While it is encouraging that all CPs have finally delivered their National Implementation Programmes (NIPs), these NIPs still, in most cases, are not comprehensive as they lack information about implementation across all segments of the BSAP and only in some cases do they provide for concrete new measures, projects, and ways to finance these.

Further, given that the NIPs vary widely when it comes to content and structure, it is very difficult to conduct an assessment of their effectiveness much less develop an effective monitoring mechanism. And, if an effective monitoring cannot be done, how then will it be possible for CPs, as well as stakeholders, to understand whether there is progress or assure that the plan can, in fact, deliver?

CCB and WWF therefore urge CPs to:

- Address all segments of the BSAP in their NIPs
- Operationalize the NIPs with proposals for concrete measures and secure funding for their implementation
- Work together and prioritize the development of an effective reporting and monitoring system to evaluate the on-going delivery of the BSAP

The lack of progress in the hazardous substances segment of the BSAP is particularly alarming given the fact that it will be impossible to reach the goal of achieving a 'good ecological status' of the Baltic Sea without stemming the serious threat posed by hazardous substances. CCB and WWF therefore urge CPs to revisit their work on this segment and to prioritize concrete actions to ensure implementation. We also urge CPs to develop concrete actions to address the biodiversity segment and to address the challenge of funding these 'soft' investments, which are critical.

There are several things that can be done now in the short term to improve the state of the Baltic Sea. Significant progress can be achieved in the following areas with relatively little effort – and, in fact, some CPs have commendably taken action in these areas:

- Ban all uses of phosphates in laundry and dishwasher detergents
- Introduce a tax on N and P in mineral fertilizers, in order to shift the focus to the recycling of nutrients
- Ensure that all future investments for agricultural production not exceed a Nitrogen-surplus of 60 kg N/ha in order to apply the nutrient-balanced practices
- Ban fishing of eel until the stock is recovered and restore inland migration routes
- Ratify the Ballast Water Convention
- Ratify the global conventions, covering the priority hazardous substances<sup>1</sup>
- Immediately install/upgrade the availability of port reception facilities for the delivery of sewage from passenger ships necessary for the entry into force of Annex IV of MARPOL in ports on the HELCOM list of prioritized ports
- Promote and secure the designation of the Baltic Sea as a NOx Emission Control Area and, as a first step, agree to submit the joint proposal to the IMO this year
- Develop management plans for existing Marine Protected Areas (MPAs), including provisions for fisheries management, and designate coastal and off-shore MPAs in order to develop an ecological coherent network of MPAs

HELCOM has outlined where actions are needed and financial institutions have made funding available. Now, all that is missing is the political will of countries. Words are no longer sufficient. The Baltic Sea, and indeed the people around the Baltic Sea region, deserve **real action** and accountable leadership. We therefore urge each of you to seek the support of your Prime Ministers/Presidents and to take the initiative and implement the concrete actions necessary to reduce nutrient input from agriculture, to control the spread of hazardous substances, reduce the impacts from fisheries and to protect biodiversity.

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<sup>1</sup>(i.e. the Stockholm POPs Convention, the protocols on POPs and heavy metals under the CLRTAP, the IMO Anti-fouling Convention, and the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade)