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Coalition Clean Baltic

**ENVIRONMENTAL NGO (COALITION CLEAN BALTIC AND WORLD WIDE FUND FOR NATURE) STATEMENT FOR HELCOM MINISTERIAL MEETING ON THE HELCOM BALTIC SEA ACTION PLAN
MOSCOW, RUSSIA
20 MAY 2010**

On behalf of the environmental NGOs, Coalition Clean Baltic and WWF, who serve as observers to HELCOM, appreciate the opportunity to share our views on the implementation of the HELCOM Baltic Sea Action Plan (BSAP). We welcomed HELCOM's initiative to launch the BSAP process that was adopted November 2007, in Krakow. 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 a first step, although not enough, to achieve 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, this opportunity appears to have been lost due to lack of political will, accountability and leadership of the region's governments. – i.e. the Contracting Parties (CPs) to HELCOM.

We have stated on several occasions that we see a desperate need for a strong action plan and for urgent implementation of the measures covered by the plan and beyond. The developed declaration lacks ambitions and strong commitment. Due to political and economical disagreements within national administrations and between CPs, the result is so far very poor. As a result, the declaration you are now set to endorse will unfortunately not guarantee the implementation of the actions or the objectives of the BSAP and do little in way of paving a clear direction and ambition for the coming years.

The role of the HELCOM Ministerial meeting in Moscow is to assess whether the BSAP will be implemented in accordance with the decisions made in Krakow in 2007, and to evaluate the National Implementation Programmes (NIPs) contribution to the objectives of the BSAP. It has not been possible to make such an assessment, as not all CPs have delivered their NIPs in time and the current existing monitoring system does not enable stakeholders to understand whether there is progress as agreed.

Most NIPs only report on the Eutrophication and Hazardous substances segments of the BSAP, which is a bad sign. This can be interpreted as Marine Conservation and Biodiversity and Maritime Activities segments of the BSAP are not of equal importance. The fact that the National Implementation Plans (NIPs) have not been submitted for all four strategic segments of the BSAP by the CPs undermines their credibility and the added value of Helcom itself of achieving the regional vision of 'a healthy Baltic Sea environment'.

SPECIFIC SECTORS TO ADDRESS

Agriculture sector

About 50 % of the nutrient pollution load to the Baltic Sea comes from the agricultural sector. Without big reduction in nutrient run-off load from agricultural land, the Baltic eutrophication problem cannot be solved.

The nutrient pollution load is directly connected to the agricultural subsidies systems in EU-countries (CAP) and in Russia, cementing the intensive agriculture practices, that creates Baltic eutrophication. The same subsidies could, if applied in a more clever way, be used as an effective tool to reduce emissions of nutrients (see e.g. WWF's report "No More Eutrophication").

The legally binding Annex III to the Helsinki Convention requires that "application of nutrients shall be based on nutrient-balance between crop nutrient requirements and nutrient supply" in all agricultural activities. This regulation is so far not implemented by CPs, especially not for intensive farming practices. CPs must transpose this requirement into national law, to implement Annex III.

We would like to see a new instrument, with strict figures on maximum allowable nutrient surplus on farmland. The N-surplus is today at a level of 50-200 kg N/ha. To apply the nutrient-balanced practices, all future investments for agricultural production should meet a requirement of maximum N-surplus of 60 kg N/ha.

HELCOM countries have reported more than 3200 industrial animal farms in the Baltic basin, which contributes substantially to the nutrient run-off from agriculture.

HELCOM countries have failed to implement the agreed action to establish by 2009 a Hot Spots list identifying existing installations for the intensive rearing of animals not fulfilling the requirements in the revised Annex III, to the Helsinki Convention.

Many countries have referred to that national permits, in accordance with the EU IPPC-directive, would guarantee fulfilment of Annex III requirements. This is not the case, as IPPC requirements are weaker than provisions of Annex III.

IPPC-directive does not deal with:

- cattle farms > 400 animal units (more than 800 such cattle farms in the BSR)

and it does not guarantee procedures for:

- application of livestock manure per year, containing maximum 170 kgN/ha and 25 kg P/ha
- nutrient-balanced application of fertilizers to farmland

We face a large diversity in national legal requirements, and in most cases a lack of implementation of the revised Annex III. The conclusion is that HELCOM countries must continue their work, and report whether every industrial animal farm fulfil Annex III or not.

The EU Nitrate Directive should in the Baltic Sea Region (BSR) be used as an instrument to control nitrogen run-off to the Baltic Sea. Designation of the whole Baltic catchment as a Nitrate Vulnerable Zone can be an efficient action to better control eutrophication from agriculture. EU-countries like Poland, Latvia, Estonia and Sweden should seriously consider designating, first 50 % and later its whole country (territory) as Nitrate Vulnerable Zone. We believe it is unacceptable to have one sector, the agriculture sector, which is allowed to discharge harmful nutrients without strict rules. Other polluting sectors have had permits with strict pollution limits for decades. The VIP – status for agriculture sector must be changed.

Biodiversity – Fisheries sector

The actions to safeguard Baltic Biodiversity connected to fisheries have been poorly or not delivered and little action is endorsed in the current declaration to reach the BSAP objective of ‘viable populations of species’. Stronger implementation is needed.

- HELCOM should develop strong actions for CPs to provide more and improved scientific data that are needed for the Baltic fish stocks, especially for the migratory species, pelagic and flatfish species, in order to develop adequate Long-term Management Plans.
- HELCOM should ask ICES to produce data, in cases where such data is missing, for the distribution of size/age-range for the above mentioned fish species

We welcome that HELCOM countries have designated BSPAs covering over 10,3 % of the HELCOM marine area. Unfortunately proper management plans to protect the biodiversity in these areas are not yet implemented, and fisheries management measures are particularly poor.

- HELCOM countries should commit themselves to prioritize implementation of fisheries related management plans in MPAs the coming year. We need strict spatial, temporal or permanent closures for all fishing efforts, and management controlling the types of fishing gear used.
- The BSAP action to conserve at least 10 threatened wild Baltic salmon river populations, by 2009, is poorly implemented so far. We call for a strong responsibility from CPs having many endangered wild salmon populations. Some countries, with threatened salmon populations, have obviously misunderstood the action, by only proposing measures to expand salmon production in rivers with wild salmon in safe numbers.

BSAP has also an action to develop appropriate breeding and restocking practices for salmon and sea-trout to safeguard genetic variability of native wild stocks, by 2012.

-HELCOM should develop strict and harmonized operational procedures at such fish-farms. Actions must be taken to ensure minimum standards on all farms that breed fish for release into the wild to safeguard the genetics of wild Baltic salmon, sea-trout and other species. Fish-farming for release should be phased-out in the future, as such procedures cannot be combined with a real ecosystem based management.

-HELCOM should also adopt strong actions for protection of the extremely threatened eel population, by development of a ban on all eel fisheries in the Baltic Sea, until the stock has recovered.

Marine Spatial Planning

We welcome and appreciate HELCOM’s joint maritime spatial planning principles with VASAB as a base to represent both conservation and sustainable development. However, there also needs a common coordinated governance platform for the integration of national work with maritime spatial planning. It is not enough to create a HELCOM working group – there must be political will and a mandate to deliver action.

We see Integrated Sea Use Management (ISUM) as a long term, strategic, inclusive and transparent process to minimize environmental impacts from resource use and to maximize benefits to society as well as reduce user conflict.

- Strong action should be taken by the CPs to realize common marine spatial planning principles as a firm and binding commitment to make it a first step on the way to make 'integrated sea use management' a norm in our sea area. This will pave the way to identify the needed structures and schemes for implementing a sound management of the sea uses.

FINAL WORDS

BSAP has received very much attention in BSR, EU and internationally as one of the best examples of a successful regional environmental programme. There has been big expectations, e.g. in relation to the EU Strategy for the BSR and the implementation of the EU Marine Strategy in the BSR.

Unfortunately the level of ambition from most of the Baltic countries is already declining. This shows a lack of real leadership, political will and ambition to restore the Baltic Sea environment.

A poor implementation of the BSAP will also put at risk the implementation of other important EU policies in the BSR, and it will endanger the credibility of the region's governments as a good example for other regions.

Clearly, your colleagues in the Ministries of Agriculture, Fisheries and Economy seem to have low ambitions for Baltic Sea Protection and would rather keep to business as usual. Their influence has been quite evident during the negotiations and subsequent weakening the BSAP ambitions.

Despite the overall weaknesses, the original intention of the BSAP remains valid – the Baltic Sea still needs urgent and concerted action. To ensure all sectors to take full responsibility of the BSAP-actions, we urge each of you to seek the support of your Prime Ministers/Presidents and together take responsibility for its weaknesses and failures of the national implementation of the BSAP. You have to develop a process that addresses the need to take dramatic and integrated action to save the Baltic Sea. You have to ensure that this action is taken at the highest level of each CP, and that Agriculture and Fisheries sectors take their full responsibility.

The Baltic Sea, and indeed the people around the Baltic Sea region, deserves **real action** and accountable leadership can achieve this – we therefore acknowledge you, Baltic Ministers of Environment and EC DG Environment, as our most important partners to save the Baltic Sea environment, and urge You to act and learn from the failings of this process. We will give our full support for a proper implementation of the BSAP.