



Saint-Petersburg – Leningrad Region

23 April 2010

Ministry of Natural Resources and the Ecology of the Russian Federation  
4/6, Bolshaja Gruzinskaya St  
D-242, GSP-5, RU-123995 Moscow

**To Head of Russian Delegation in HELCOM  
Ms Natalia Tretiakova**

E-mail: nataliat@mnr.gov.ru

**Dear Ms. Natalia Tretiakova,**

Russian environmental NGOs «Green World», «Friends of the Baltic» – members of Coalition Clean Baltic Network (CCB) as well as partners of CCB – «Baltic Fund for Nature» of St.-Petersburg society of Naturalists and «Centre of Environmental Initiatives» submit to you proposals for the Russian National program for Implementation of HELCOM Baltic Sea Action Plan (BSAP):

#### **Biodiversity segment of the BSAP and Russian implementation**

In signing the HELCOM BSAP in 2007, Russia has agreed to protect and preserve the threatened Baltic Salmon. From HELCOM Baltic Sea Action Plan:

*“To reach the target and objectives associated with the favorable conservation status of the Baltic Sea biodiversity*

- *the development of restoration plans (including restoration of spawning sites and migration routes) in suitable rivers to reinstate migratory fish species, by 2010;*
- *the active conservation of at least ten endangered/threatened wild salmon river populations in the Baltic Sea region as well as the reintroduction of native Baltic Sea salmon in at least four potential salmon rivers, by 2009”, (page 23 of the Action Plan)*

Baltic Salmon only exists in the Baltic Sea and in Russia mainly in one single river, namely the Luga River in Leningrad Oblast. The Luga River is by far the most important Salmon River in the Gulf of Finland and Russia should be proud of the fact that the country has been able to preserve the salmon in this water system up until today. However the numbers of wild salmon are reaching alarmingly low levels and action is needed not to lose this unique salmon and the salmon habitat the Luga River.

#### **To fulfil the commitments from the HELCOM BSAP Russia should include in National program following actions:**

to introduce active protection measures for the Luga River wild salmon in 2010-2011, for e.g. on:

- control of illegal fishing;
- monitoring and research;

- habitat restoration and protection;
- safeguarding the genetic variability of Luga salmon;
- sustainable management of the Luzhskiy production-experimental salmon factory.

Proposals for a Luga River Salmon management plan are essential part of this document as an **Annex 1**.

Those proposals were also supported by participants of the Roundtable “Segment Biodiversity of HELCOM BSAP” within the XI International Environmental Forum “Baltic Sea Day” which was held in St.-Petersburg 22-24 March 2010. Resolution of the Roundtable is essential part of this document as an **Annex 2**.

### **Euthrofication segment of BSAP**

In the Gulf of Finland basin and Kaliningrad oblast still many rural settlements, small towns, gardening and “dacha” communities with of hundreds thousands individual houses have no any wastewater treatment facilities and discharge wastewater with reach content of nutrients into the rivers or directly to the sea. Farm waste and mineral fertilizers are still a strong pollution factor for the Baltic Sea catchment area.

To fulfil HELCOM recommendations Russia has to include to the national plan the following actions:

#### *Phosphates in the detergents:*

To make a national program and present a concrete measures on substitution of polyphosphates as builders in laundry detergents for consumer use.

To present time table for reduction of total phosphorus to the limit 0.2 to 0.5% P of total production weight – as a minimum for North-West Russian regions, which belong to Baltic Sea drainage area..

#### *Agriculture:*

- Russia to present actions to implement the restrictions and limitations for fertilizer use on agricultural land, in accordance with Annex III of the Helsinki Convention.
- Include to national plan measures for application of a modern technologies and best practices, including technologies for safe storage and utilization of farm waste and methods of organic agriculture, protecting Baltic Sea from organic waste.

#### *On small wastewater installations:*

- To present a Russian plan for the implementation of the HELCOM recommendation 28E/6, from the Krakow Ministerial meeting, about On-site wastewater treatment of single family homes, small business and settlements up to 300 person equivalents (p.e.), as well as gardening and “dacha” communities. Include to the national plan application of best practices for small scale waste water technologies, including “dry toilets”.

### **Maritime segment of the BSAP and Russian implementation**

HELCOM has adopted eight management objectives for the Maritime segment implementation. HELCOM Contracting Parties have agreed upon the objective:

“No introductions of alien species from ships”

Many international fora, such as WHO, have for many years raised concerns on potential threats from introduction of alien invasive aquatic species from the Black and Caspian Sea ecosystems to the Baltic Sea. A couple of new species with origin from the Ponto-Caspian area have been introduced to the Baltic Sea last years.

In the Gulf of Finland in 2000<sup>th</sup> two species natural in Caspian and Black Sea were founded: *Neogobius melanostomus*, which is also present in rivers/channels around Moscow, and in Gdansk Bay in early 90-ies, and *Proterorhinus marmoratus*. This aggressive species are very invasive – dangerous and have a potential to occupy all Gulf of Finland and Baltic Sea. Most probably these alien fish species was coming via Russia.

**To fulfil the commitments from the HELCOM BSAP Russia should include in National program following actions:**

- Survey of number and type of ships from Russian rivers/canals entering the Baltic, incl. information of ballast water, to estimate potential risks for alien aquatic introductions;
- To develop and present actions by 2011 to mitigate such risks;
- Russian Federation to ratify the Ballast Water Convention (BWC) not later than 2013, in accordance with HELCOM agreements.

Russian NGOs, official members and partners of Coalition Clean Baltic Network, which join 27 environmental NGOs from each country of Baltic Sea Region:

**“Green World”**

Non-governmental, Non-profit environmental charity organization

Chairman of Council **Oleg Bodrov**  
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**Baltic Fund for Nature**

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**“Friends of the Baltic”**

Non-governmental, Non-profit environmental organization

Chairwoman and Board member of CCB  
**Olga Senova**

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**Centre of Environmental Initiatives**

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Please send your answer to post address of “Green World” and “Friends of the Baltic” mentioned above or to e-mail address: [vera-ovcharenko@mail.ru](mailto:vera-ovcharenko@mail.ru) or [olga-senova@yandex.ru](mailto:olga-senova@yandex.ru)