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WWF POSITION STATEMENT ON THE HELCOM BALTIC SEA ACTION PLAN

(Strictly Embargoed Until 15 November 2007)

WWF, like many organizations and governments around the region, welcomed Helcom's initiative to launch the Baltic Sea Action Plan (BSAP) process nearly two years ago. The ambitions of the BSAP to deliver wide-scale and decisive actions necessary to achieve a good ecological status for the Baltic Sea was seen by WWF and many others as fulfilling a critical need to achieve ecosystem based management in the Baltic Sea region. Further, the BSAP process was also seen as a unique opportunity 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 the lack of political will, accountability and leadership of the governments – i.e. the Contracting Parties (CPs) to HELCOM – around the region.

The BSAP plan¹, endorsed with much fanfare by senior officials and Environmental Ministers of the Baltic Sea countries, falls far short of its lofty ambitions. Originally, the proposed text of the plan did indeed include many of the ambitious actions and tough decisions that are so urgently needed. Over time, however, the plan has been successively narrowed in scope and weakened due to political and economic disagreements between CPs – so much so that the plan agreed by Ministers in Poland is but a shadow of its former self. Instead, the BSAP is now high on rhetoric but devoid of the very ambitious actions and commitments which were the reason the BSAP was originally conceived. What is left is yet another declaration which promises to 'save the Baltic' but will do little more than add to the already growing stack of paper declarations that restate CPs commitment to protect the Baltic – but offer little in the way of tough actions and binding commitments that will hold them accountable to actually doing just that.

While HELCOM and the Contracting Parties (CPs) around the region claim that the BSAP 'is designed to solve all major environmental problems affecting the Baltic Sea' the fact remains that the plan rarely steps beyond actions which have already been agreed and negotiated in other fora. As such, the plan has a strong focus on supporting the effective implementation of existing EU directives and relevant global conventions, which is arguably important, but does little to demonstrate the added value of the BSAP and indeed HELCOM itself. WWF would like to highlight some of the major deficits of the plan in an effort to unpen the rhetoric and expose the reality – that this plan is a political declaration which does not include the necessary actions to deliver what it has promised. Key weaknesses including the following:

In the Eutrophication Segment:

- The country-wise nutrient reduction requirements which have been agreed by CPs are a positive development towards reaching the BSAP aim of 'good environmental status with regards to eutrophication of the Baltic Sea'. Unfortunately, however, CPs only adopted these targets provided the figures used were considered to be 'provisional'. This means that the legitimacy of these figures has been compromised and will likely be altered in the future by CPs. Furthermore, it is not clear how these reduction targets will be implemented, monitored and enforced at the national level – which calls into question whether CPs will truly take action to honour and implement these commitments.
- In order to achieve the BSAP ecological objective of 'concentrations of nutrients close to natural levels', actions to reduce nutrient inputs from agriculture, the main source of nutrient inputs to the Baltic Sea, is critical. Unfortunately, however, there are no specific actions included in the BSAP to significantly limit the losses of P and N from agriculture. Instead the action plan simply

¹ For more detail on the background, goals and objectives of the HELCOM Baltic Sea Action Plan please visit: http://www.helcom.fi/BSAP/en_GB/About_BSAP/

includes an endorsement of a 'list of examples' of measures for reducing P and N losses from agriculture – measures that are already commonly known but, due to a lack of political will, are not uniformly practiced. This list therefore adds nothing new and does not include any actions for CPs to take to implement these examples. Noticeably absent from this section is a recommended ceiling for the per hectare use of artificial fertilizers and the designation of the whole Baltic catchment as a Nitrate Vulnerable Zone.

- In order to help reach the goal of 'a Baltic Sea unaffected by eutrophication' HELCOM commissioned a report to evaluate the cost efficiency of possible actions. One of the most cost effective actions identified in the report, and originally proposed to be included in this segment of the BSAP text, was to ban the use of phosphorous in detergents. CPs, however, could not agree to this now, despite the fact that the report said that the 'the cost of banning P in washing and dish washing detergents is negligible.'
- The BSAP goal, 'towards a Baltic Sea unaffected by eutrophication' will most likely be affected by climate change, which is widely expected to significantly increase the effects of eutrophication on the Baltic Sea. Despite this threat, there is no mention of this, nor are any actions to address this increasing threat, included in the text. The issue of climate change is, in fact, widely missing from the entire BSAP despite the fact that this will be one of the most significant challenges the region will face in the coming years.

In the Hazardous Substances Segment:

- The BSAP ecological objective of "All fish safe to eat" sounds promisingly ambitious compared with the current situation – i.e. that some fish species caught in some parts of the Baltic Sea are not suitable for human consumption. Unfortunately, the plan lacks any concrete, detailed activities and corresponding responsibilities to reduce the pollution of the Baltic. Instead, the Hazardous Substances segment is a political statement to continue activities under other existing programmes and processes.
- In order to reach the BSAP ecological objective of 'concentrations of hazardous substances close to natural levels' the hazardous substances segment rightly mentions the importance of ensuring the effective implementation and enforcement of existing EU legislation (such as WFD, IPPC, REACH) and international commitments (such as the POPs convention) as tools to improve the state of the contamination of the Baltic. Yet, there are no specifics of what exactly will be improved and by whom and in which areas of the Baltic this will be most relevant (i.e. there will most certainly be different needs in old EU Member States, new EU Member States and Russia).
- In order to reach the BSAP goal of 'a Baltic Sea with life undisturbed by hazardous substances by 2021' strong action is needed. However, the majority of substances/substance groups on the list of specific concern to the Baltic Sea which are included in the hazardous substances segment have already been banned/restricted in the EU or are addressed globally. The selection is very limited and there is no clear process for how and when other hazardous chemicals will be added. Further, many of the substances on the list of specific concern are not included in the Russian Federations national legislation and this issue has not been addressed.

In the Biodiversity Segment:

- In order to reach the BSAP goal of 'a favourable conservation status of Baltic Sea Biodiversity' strong actions are required. The biodiversity segment of the BSAP, however, is very weak in general and lacks true actions – instead focusing primarily on research, the development of tools, principles and guidelines, but includes few agreements on implementation and real action for protection. A primary example of this follows in the proceeding bullet point.
- The establishment of a network of Baltic Sea Protected Areas is mentioned in the action plan as one of the main tools to reach the targets and objectives associated with the goal of 'a favourable conservation status of the Baltic Sea Biodiversity'. The establishment of a "network of well-

managed marine protected areas” was agreed already in 1994 and was reaffirmed in the joint HELCOM/OSPAR ministerial declaration in 2003. Despite the fact that the already agreed 2003 ministerial declaration and the HELCOM/OSPAR joint work program clearly states that “the ecological coherence of the network of marine protected areas should be regularly assessed” and that “steps should be taken to identify and fill any gaps that are identified”, some Contracting Parties refused to include the wording ‘identify and fill the gaps’ in the Baltic Sea Action Plan. As a result the CPs have only agreed to undertake an assessment, by 2010, but not to take any action if gaps are identified. This means that the BSAP is in this aspect even weaker than previously existing agreements.

- In order to reach the BSAP ecological objective of ‘viable populations of species’, taking actions to address the obvious risk of a collapse of the Baltic cod stocks and to safeguard the remaining 600 harbour porpoises, which are extremely threatened by by-catch in fishing gear are urgently needed. Unfortunately, strong actions to address these two issues are noticeably absent from the plan.

In the Maritime Transport Segment:

- In order to reach the BSAP ecological objective of ‘safe maritime traffic without accidental pollution’ taking strong action to address the threat of oil spills is critical. Despite the knowledge of how devastating an oil spill during periods of ice cover is, due to the difficulty in clean up and oil recovery, the CPs could not agree to propose mandatory pilotage for winter navigation under ice conditions in the Northern Baltic Sea, including the Gulf of Finland. Instead, this is weakly stated so as to ‘encourage shipping companies to use ships with crew trained for winter navigation and to use voluntary pilotage’.
- In order to reach the BSAP ecological objective of ‘no introduction of alien species from ships’ strong actions are needed to stem the threat posed by the introduction of alien species into the Baltic Sea via ships ballast water. Unfortunately, however, there are no concrete actions identified in the BSAP to address this. Instead, what is included is simply a ‘road map’ towards the ratification and harmonized implementation of the Ballast Water Convention, which is arguably important – but does not go far enough to protect the Baltic from introduced species. Noticeably absent from this segment of the BSAP are regional actions and agreements on ballast water treatment as well as mandatory regulations to control the origin of ballast water for all ships entering the Baltic and permit procedures for all possible release of ballast water in to the Baltic Sea.

Conclusion

WWF believes the true failure of this plan can be directly traced to the lack of political will and leadership on behalf of CPs. Participation in the ‘Ministerial’ meeting did not even include Environmental Ministers from Denmark, Germany and Latvia, which may indicate the low importance of this process for these CPs. Furthermore, as the original intention of the BSAP was to take a holistic and integrated approach to tackling the many challenges in the region – it was a flawed intention from the start to only seek to include the agreement of environmental ministers. In order to be successful, this plan requires strong support from the highest level of government of each CP, and commitment that the BSAP will be implemented in a coordinated and integrated way across ALL relevant ministries and departments.

WWF is dismayed to find that this plan has been ‘widely heralded as a pilot project for the European seas under the EU Marine Strategy and a model to be followed by other regional marine conventions around Europe’. Clearly, given the deficits of the plan, many of which are summarized above, this plan should neither be a pilot project nor a model for other regions to follow. Furthermore, since little attention has been given to how this plan will be implemented, coordinated, funded and evaluated - there is no clear understanding regarding how Helcom and CPs will even be able to manage and monitor this plan. Finally, even the few actions that have been identified are recommendatory and non-binding. This means that there is no guarantee that contracting parties will even take these actions. Given the poor track record of implementation of Helcom recommendations

by CPs, this is indeed a serious concern that, again, little action and therefore little progress will be made towards implementing the plan.

Despite the overall weaknesses of the plan, the original intention of the BSAP remains valid – the Baltic Sea still needs urgent and concerted action to protect and restore it to ‘good ecological status’. WWF therefore urges Prime Ministers/Presidents around the region to take responsibility for the failures of this plan and to initiate a new process in which they and their governments agree to be held accountable to actually deliver what was originally promised by their governments – to take dramatic action to save the Baltic.

WWF therefore urges each CP to:

1. Implement the BSAP but acknowledge that the implementation of the plan will not be enough to reach the goals and objectives of the BSAP and to therefore:
2. Take responsibility for its weaknesses and failures by restarting a process to address the still urgent need to take dramatic and integrated action to save the Baltic – ensuring that this action is taken at the highest level of each CP – ideally in the form of a summit meeting in order to secure the health of the Baltic and therefore the continued economic success and quality of life of the region.

Enough time and taxpayers money and patience has been wasted in political disagreements. The Baltic Sea, and indeed the people around the Baltic Sea region, deserve more than platitudes and diplomatic declarations. Words will not secure the health of the Baltic Sea nor the quality of life of the entire region. Only real action and accountable leadership can achieve this – and the time for action is now.