

Riga, Latvia, 28-30 October 2025

Document title	Stop new oil and gas extraction in the Baltic Sea
Code	11-4
Category	INF
Agenda Item	Any other business
Submission date	14.10.2025
Submitted by	CCB
Reference	Helsinki Convention (art 7,12, 16,17, Annex VI), HELCOM BSAP (S1), Rec. 17-3 , 19-7 , 18-2

Background

In July 2025, alarming news emerged about the plans to exploit an oil and gas deposit located 6 km offshore Świnoujście, Poland. The site lies in the transboundary waters of the Oder Estuary and the Pomeranian Bay – NATURA 2000 protected areas, and vital for nature, climate and local communities.

Oil and gas extraction in the Baltic Sea poses severe threats to its fragile ecosystems, especially in shallow waters and underground reserves. Porpoises, seabirds such as the long-tailed duck, fish like Baltic herring and sprat are highly vulnerable to degraded water quality caused by chemicals used, leaks and potential accidents, as well as to underwater noise pollution from pile driving, ship traffic, and pipelines used for offshore rigs. Already under huge pressure, these species and habitats would face even greater harm.

The prospected oil and gas deposits extend across the German-Polish border, with plans for up to eight drilling rigs. Despite the high risks, no valid and comprehensive environmental impact assessments have been carried out so far.

Such projects contradict the purpose of EU NATURA 2000 protected areas and would breach several EU and international commitments, including the Marine Strategy Framework Directive, the Birds Directive, the Habitats Directive, the Helsinki Convention and its Baltic Sea Action Plan (BSAP) as well as climate goals.

Indeed, scientists warn that no new deposits should be developed if we are to keep global warming below 1.5°C. By moving forward, Poland could become dependent on fossil fuels with serious financial and climate consequences, undermining EU climate targets and international obligations.

Therefore, **we, the environmental NGOs from the Baltic Sea Region, representing at least 1.5 million residents of the region, call** respectively on Ministry of Climate and Environment of Poland, the Helsinki Commission (HELCOM), the European Commission, and the Secretariat of the Espoo Convention **to** undertake urgent actions to:

- **Stop the plans for oil and gas extraction in the Oder Estuary and the Pomeranian Bay**, violating climate, environmental regulations and goals;
- **Ban any new oil and gas extraction across the Baltic Sea**, preventing deterioration and ensuring protection of Baltic marine ecosystem²;
- **Ensure strong cross-border cooperation and communication amongst all involved states**, including sharing of environmental impact assessments and timely notifications of planned consultations or other measures.

[Public petition](#) reflecting the above call for action has been launched by CCB with its member organizations and to the date received already **58,378 signatures** of European residents.

Action requested

The Session is invited to take note of the position of the Coalition Clean Baltic and its members and call for compliance with the Helsinki and Espoo Conventions, as well as HELCOM Baltic Sea Action Plan when it comes to implementing any new large scale offshore infrastructure projects, including offshore rigs.

Riga, Latvia, 28-30 October 2025

Document title	UN Ocean Conference 3 - CCBs side event - Quiet Seas in a Climate Transition - Aligning decarbonisation with Ocean Health
Code	11-5
Category	INF
Agenda Item	Any other business
Submission date	14.10.2025
Submitted by	CCB
Reference	Provisional annotated agenda

Background

The Third United Nations Ocean Conference (UNOC3), took place on the 9-13 June 2025 in Nice, France, representing a key moment for the global efforts to implement Sustainable Development Goal 14 ([SDG 14](#)): Life Below Water.

CCB's side event: "Quiet Seas in a Climate Transition: Aligning decarbonisation with Ocean Health" was held on the 11th June 2025, under UNOC3. The event aimed to foster dialogue among stakeholders (industry, government, and civil society) to explore solutions to reduce underwater noise, focusing on the Baltic and North Seas, while addressing climate-oriented technologies such as offshore wind energy, cleaner shipping, and carbon capture and storage (CCS).

Underwater noise pollution intersects with climate change as offshore renewable energy projects and shipping decarbonization measures, while essential for reducing emissions, can increase underwater noise levels. Moreover, emerging solutions like offshore carbon capture and storage (CCS) not only risk harming marine life through underwater noise, but also divert focus from root-cause climate action by prolonging fossil fuel dependency.

CCB's side event raised awareness of underwater noise impacts on marine ecosystems, highlighting the need to align decarbonisation with marine protection. Through expert presentations, a panel discussion, and an interactive dialogue with present participants, the event engaged discussions to identify integrated approaches and cross-sectoral partnerships that support biodiversity and a sustainable climate transition, contributing to the SDG 14, through marine conservation, sustainable use, and science-based solutions.

The main outcomes from the discussions were:

- Technological solutions for clean shipping and offshore wind are important steps towards decarbonisation and should address reduction and monitoring of underwater noise;
- Coordination, ecosystem-focused financing and stakeholder involvement are key to reduce noise pollution from different sources and close data gaps;
- CCS, involving seismic activities, is not a solution against climate change, but a marketing coup to continue business-as-usual actions linked to oil and gas activities;
- We know that climate efforts are necessary but not at the expense of ocean health;
- Marine protection should not go against climate action. In fact, reducing noise and increasing marine protection are also climate actions.

Action requested

The Session is invited to take note of the outcomes of CCB's side event on underwater noise from climate-oriented technologies.

Riga, Latvia, 28-30 October 2025

Document title	Outline for the discussion of amending Baltic Sea PSSA with new APMs based on BSAP
Code	12-1
Category	INF
Agenda Item	Future work and meetings
Submission date	27.10.2025
Submitted by	CCB
Reference	Provisional Annotated Agenda, Memo of IC MARITIME 3-2024 (para 12.6)

Note that this document was submitted after the established deadline. It will be decided by the Session whether the document can be discussed or is postponed to the next meeting.

Background

The attached document outlines points for the discussion on options and perspectives for amending the status of the Baltic Sea Particularly Sensitive Sea Area (PSSA) ([MEPC.136\(53\)](#), 2005) by strengthening or adapting its Associated Protective Measures (APMs). It aligns the evaluation of Baltic PSSA effectiveness ([WWF/WMU, 2014](#)) with sea-based and cross-sector actions in the revised HELCOM BSAP that could be accelerated or made more effective if supported by stronger PSSA measures.

The PSSA remains a valuable instrument to coordinate international shipping-related protection measures, but it does not by itself create enforcement powers. Any strengthening should therefore focus on adopting or amending Associated Protective Measures that are either mandatory under IMO instruments or implemented regionally/nationally.

Already in 2014, WWF suggested several concrete APMs and targeted geographic applications (e.g. areas to be avoided, deep-water routing, expanded pilotage and ship reporting) that could improve safety of navigation and reduce collision and pollution risk in key sensitive habitats.

Since the adoption of revised HELCOM BSAP (2021), implementation of several regional actions on sea-based activities, hazardous substances, underwater noise, and biodiversity were having not enough progress due to lacking capacities and drive to support those. They however could be directly supported (and in some cases accelerated) by stronger or updated PSSA APMs.

Practical steps towards that would include: devising the actions that would benefit most from being implemented via PSSA, targeted APM amendments at IMO (via MEPC/MSC), coordinated national/regional implementation, alignment of maritime spatial planning (MSP), and filling governance/enforcement gaps through national/regional legislation and monitoring.

Action requested

The Session is invited to take note of the document and use it as appropriate in further work on possible Baltic Sea PSSA amendment.

Outline for the discussion of amending Baltic Sea PSSA with new APMs based on HELCOM BSAP

1. Background: PSSA purpose and the Baltic Sea designation

IMO defines a PSSA as an area that needs special protection because of its ecological, socio-economic or scientific significance, and because it may be vulnerable to damage by international shipping activities. The PSSA complements other MARPOL “special area” designations and regional instruments (e.g., SECA, MARPOL special areas) but does not itself confer direct jurisdictional enforcement powers and rather, it provides the basis to propose mandatory measures under IMO instruments or to coordinate national/regional measures.

IMO designated the Baltic Sea Area, except for the waters under the jurisdiction of the Russian Federation, as a PSSA and listing a set of Associated Protective Measures (APMs) intended to reduce shipping risks to sensitive habitats and species ([MEPC.136\(53\)](#)). The work on designation was based on the commitment from [HELCOM Copenhagen Declaration \(2001\)](#) “to investigate the benefits from designating parts of the Baltic Sea Area as a Particularly Sensitive Sea Area (PSSA)” with a clear goal to improve safety of navigation following the MT “Baltic Carrier” ([2001](#)) accident and oil spill.

2. Current Associated Protective Measures (summary)

The Baltic PSSA (MEPC.136(53)) included the following mostly routing measures as APMs:

- A. Two traffic separation schemes (TSSs) were established, one in Bornholmsgat and another to the north of Rügen. Their aim was to improve maritime safety by directing traffic into the schemes, thereby reducing the risk of collisions pertaining to encounters and crossings and, correlatively, the risk of pollution.
- B. An inshore traffic zone south of Gedser was introduced in order to guide transit traffic into the TSS south of Gedser and relocate transit traffic between the TSS and the German coast.
- C. A deep-water route off Gotland Island was established in order to organize traffic of ships with a draught of more than 12 m.
- D. Norra Midsjöbanken and Hoburgs Bank were designated as areas to be avoided in order to protect bird habitats, seals and mussel banks from oil spills.

These measures have probably reduced accident risks and helped to organise traffic away from some sensitive areas, but the [WWF/WMU, 2014](#) review observed continuing concerns (illegal discharges, localized accident and spill risk near new ports and dense routes) and identified opportunities for strengthening and adaptation. Since then the situation has improved with regards to reducing the risks of accidents and introducing new anti-pollution regulation. However current geopolitical situation, as well as reconsidering some of earlier less addressed ship-borne pressures and impacts (e.g. underwater noise and discharges of grey-water and tank washings) may lead to development and amendment of new APMs.

3. What the WWF/WMU (2014) analysis recommends (key points)

The 2014 WWF/WMU report assessed PSSA effectiveness and proposed a set of pragmatic improvements. The main recommendations that remain relevant for a contemporary review include:

- **Consideration of additional Areas to Be Avoided (ATBAs)** at important bird and habitat grounds (several candidate sites were identified in the report) to reduce exposure of sensitive habitats to shipping risk.

- **Expansion or targeted application of compulsory pilotage** in narrow or high-risk passages (noting particular risks around Danish Straits and approaches to certain ports), including for ships carrying heavy fuel oil or hazardous cargoes.
- **Strengthening and optimization of mandatory ship reporting systems (MRS)** to better detect aberrant behaviour and speed emergency response and enforcement; modernising reporting and AIS-based monitoring was also recommended.
- **Review and refinement of routing measures (TSS, deep-water routes)** to reflect changing traffic patterns (new ports, altered trade routes) and the needs of marine spatial planning and conservation (e.g., to steer away from new MPAs or important seabed habitats).
- **Linking PSSA/APMs more systematically with MSP and national/regional governance**, so routing and other APMs are coherent with marine protected areas, HELCOM measures and coastal state planning.
- **Improving legal and enforcement clarity**, recognising that the PSSA is a coordination tool: to be effective, APMs frequently require parallel national legislation, monitoring, and enforcement resources.

The report also notes that many APMs are recommendatory in EEZ waters and that adoption of *mandatory* measures at IMO (or via MARPOL amendments) is the most effective route for creating binding protection at sea.

4. Key opportunities to alter/strengthen PSSA status and APMs — practical options

Below are pragmatic pathways (with pros/cons and high-level implementation notes) for altering PSSA status or strengthening its operational effect.

4.1 Amend or supplement Associated Protective Measures at IMO (technical amendments / new APMs)

Submit proposals to IMO (MEPC/MSC) to add or modify APMs (e.g., create Areas to Be Avoided, make certain reporting systems mandatory, amend deep-water routing, extend mandatory pilotage triggers). Coastal states (individually or jointly via HELCOM) should assemble technical evidence (risk assessments, traffic density maps, sensitivity overlays) and draft IMO-complaint proposal text; build regional consensus with neighbouring states; coordinate with IMO sub-committees (navigation, pollution) to ensure proposals are framed as safety-oriented where appropriate.

Pros:	Cons:
Creates internationally agreed measures that are persuasive and (in the case of mandatory measures) binding for flag states and ships.	IMO procedures are technical and political; proposals require robust safety and environmental justification and time to adopt (and subsequent national implementation).

4.2 Introduce additional nationally-enforced measures supported by the PSSA (national/regional legislation)

Use PSSA designation as political-technical support to pass national laws (or regional agreements) to implement measures that are recommendatory at IMO (e.g., national compulsory pilotage, enforcement of ATBAs inside EEZs, enhanced port state control for illegal discharge). HELCOM could facilitate harmonized model legislation, common enforcement protocols, and coordinated monitoring (AIS analytics, joint surveillance patrols).

Pros:	Cons:
Faster to implement than IMO amendments, allows tailored enforcement resources, and can be linked directly to HELCOM commitments.	Measures may be asymmetric between states and could create compliance/operational complexity for shipping if not harmonized.

4.3 Expand geographic extent of the PSSA or redefine boundaries for targeted protection

Propose a revision of the PSSA boundaries at IMO to include new vulnerable sub-areas (e.g., emerging risk areas near new ports, bird habitats identified by WMU/WWF). Prioritize candidate sub-areas with strong scientific justification and HELCOM support; perform cumulative risk and benefit analysis for each candidate.

Pros:	Cons:
Provides an international platform to propose APMs for newly covered areas.	Boundary changes trigger re-assessment and political negotiation; Russia's territorial waters were excluded in 2005 and any change involving adjacent jurisdictions requires sensitivity.

4.4 Use PSSA to accelerate implementation of HELCOM BSAP sea-based actions

Identify BSAP actions that depend on or would be substantially aided by shipping measures (e.g., actions addressing hazardous substances from shipping, underwater noise reduction, improved port reception facilities, ballast water management enforcement) and use PSSA/APMs as the coordinating mechanism to scale those actions. Prepare an aligned matrix mapping BSAP 'sea-based activities' actions to specific APM changes (e.g., ship reporting + port reception improvements to reduce illegal discharges; routing + speed measures to reduce underwater noise and collision risk for mammals and birds).

Pros:	Cons:
Links IMO/regional instruments to HELCOM targets; concentrates advocacy and funding for implementation; can improve implementing capacity by signaling political priority.	Success depends on national willingness to allocate resources and on aligning implementation timelines

5. How PSSA changes can boost selected HELCOM BSAP actions

Below are illustrative pairings between HELCOM BSAP actions (2021 update) and the specific PSSA/APM levers that could accelerate them.

- BSAP action: Reduce pollution from ships (illegal discharges, harmful substances)**
PSSA levers: Mandatory reporting systems, strengthened port reception obligations in coordination with the IMO, enhanced port state control, targeted ATBAs to reduce ship density around vulnerable habitats.
- BSAP action: Reduce underwater noise and protect sensitive species**

PSSA levers: Voluntary/mandatory speed reductions in defined corridors, rerouting away from sensitive straits/biological aggregations, inclusion of noise considerations in routing/TSS design.

- **BSAP action: Protect biodiversity and threatened habitats**

PSSA levers: New Areas to Be Avoided covering important bird areas and sensitive seabed habitats; re-alignment of deep-water routes and TSSs to reduce overlap with MPAs; mandatory pilotage in high-risk approaches.

- **BSAP action: Address marine litter and port reception facilities**

PSSA levers: Strengthen ship reporting and port reception coordination, highlight PRF improvements as part of PSSA-supported measures, use PSSA political platform to secure financing for PRF upgrades.

- **BSAP action: Strengthen monitoring and response to incidents**

PSSA levers: Harmonized AIS/monitoring tied to mandatory ship reporting and faster cross-border spill response arrangements triggered by ship reports.

Each pairing above can be expanded into concrete, time-bound actions (project fiches) jointly developed by HELCOM and coastal states and phasing into national regulations and IMO proposals where necessary.

Annex: Potential groups of APMs in relation to HELCOM BSAP actions

[APM D.] Addressing pollution from ships (illegal discharges, sewage, oily waste, garbage, hazardous cargoes)

Reduce pollution from shipping; improve port reception facilities and port state control.

1.1 Mandatory ship-reporting + targeted enforcement corridors

Actions to strengthen monitoring of ship-borne pollution, and to reduce illegal discharges through better surveillance and port state control.

Extend/create mandatory ship-reporting systems (MRS) for approaches to sensitive coasts/ports and for corridors near identified pollutant hotspots. Require enhanced reporting for high-risk cargoes (e.g., HNS, bunkering operations) and vessels above a size threshold.

1.2 Designated “no-discharge”/enhanced-PRF zones around sensitive areas

Actions to upgrade port reception facilities (PRFs) and reduce at-sea discharges.

Under the PSSA, specify zones (adjacent to vulnerable MPAs, bird colonies, spawning grounds) where discharges from ships (e.g., sewage, garbage, bilge) are explicitly discouraged and where port reception standards are prioritized; pair this note with an obligation for coastal states to ensure adequate PRFs at nearby ports.

[APM E.] Biodiversity protection (MPAs, seabed integrity, bird areas, spawning grounds)

Protect biodiversity, expand/implement MPAs, reduce seabed disturbance and accidental harm.

2.1 Areas to Be Avoided (ATBAs) around key MPAs, bird-congregation and spawning sites

Actions to safeguard habitats and threatened species (bird areas, marine protected areas).

Propose specific ATBAs for the most vulnerable sites identified in HELCOM assessments (e.g., seabed habitats and key bird feeding areas highlighted in BSAP/HELCOM data).

2.2 Rerouting / re-aligning Traffic Separation Schemes (TSS) and deep-water routes to avoid MPAs

Actions on marine spatial planning (MSP) and ensuring shipping is coherent with MPAs.

Adjust existing TSS and deep-water tracks (or create recommended transit lanes) so that they minimise overlap with HELCOM-identified MPAs and sensitive seabed habitats.

2.3 No-anchoring zones in/near sensitive habitats and within MPAs

Actions to protect seabed and benthic habitats from physical disturbance.

Define explicit no-anchoring zones in seabed-sensitive locations (e.g., reefs, seagrass beds, known historic/archaeological sites) as part of the APM package.

[APM F.] Underwater noise & collision risk (marine mammals, birds)

Reduce underwater noise and disturbance, prevent wildlife collisions, protect mammals and birds.

3.1 Seasonal or permanent speed-restriction zones

Actions to reduce disturbance, disturbance-related mortality and collision risk for cetaceans, seals and seabirds.

Implement speed limits in specific corridors or ATBAs, either seasonally (e.g., during migration/breeding) or permanently where populations are particularly sensitive.

3.2 Reroute transits away from important mammal/bird congregations

Actions to spatially separate high-risk traffic from key wildlife aggregations.

Temporarily or permanently shift transit lanes away from observed congregation areas using TSS/route amendments or ATBAs.

[APM G.] Shipping-borne hazardous substances

Reduce pressures from hazardous substances.

4.1 Special routing and mandatory reporting for vessels carrying HNS / hazardous substances

Actions addressing transboundary pollution risk from hazardous substances transported by sea. Require dedicated reporting routes and mandatory advance notification for ships carrying hazardous or noxious substances in sensitive corridors; consider restricting transit of highest-risk cargoes close to MPAs.

[APM H.] [Operational safety measures \(pilotage, pilot boarding, port approaches\)](#)

Reduce accident risk and improve safe navigation near coasts and ports.

5.1 Compulsory pilotage for specified vessel types/routes

Actions to reduce accidents, groundings and spills in narrow straits and approaches.

Make pilotage compulsory for large tankers, vessels carrying HFO/HNS, or for transits through narrowly constrained approaches adjacent to MPAs; embed pilotage triggers in the PSSA APM package.

5.2 Mandatory tug escort for high-risk transits

Actions to prevent accidents in approaches near sensitive areas.

Require tug escorts for certain vessels (e.g., VLCCs, vessels on ballast voyages, HNS carriers) in constrained approaches to MPAs or within certain PSSA subareas.

Quick prioritisation

1. **Low-hanging / fast regional wins:** Mandatory ship reporting in high-risk corridors, pilotage extensions, and no-anchoring zones. These can be implemented nationally or regionally while the IMO process runs.
2. **Medium term (IMO proposals):** ATBAs, TSS/route changes, and seasonal speed restrictions - need evidence packages and IMO safety/environmental justification.
3. **Enabling investments:** PRF upgrades linked to PSSA no-discharge priorities

Appendix B. Sea-based BSAP actions relevant for PSSA amendment

S5	Further strengthen co-operation with the International Maritime Organization (IMO) and regional co-operation in the field of safety of navigation in the framework of the HELCOM Maritime Group, as appropriate, in particular recognizing the need for the exchange of technical expertise regarding risk assessment to avoid shipping accidents in the Baltic Sea.
S31	Conduct a feasibility study by 2022 for, and as appropriate, undertake a risk analysis for oil and hazardous and noxious substances (HNS) pollution of the marine environment in the Baltic Sea area by 2025.
S16	Carry out a study and impact assessment by 2026 to estimate and evaluate the volumes and impact of discharges of residues of noxious liquid substances contained in cargo tank washing waters under the International Convention for the Prevention of Pollution from Ships (MARPOL) Convention Annex II into the Baltic Sea. Based on the results, take relevant action by 2028 on whether and how to further limit discharges of residues of noxious liquid substances contained in cargo tank washing waters under MARPOL Annex II into the Baltic Sea.
S14	Carry out a study and impact assessment by 2025, assessing the possible ways for cargo ships to deliver sewage to port reception facilities (PRF) or take treatment measures, using onboard treatment plants, before discharging it into the sea. Based on the results, take relevant action in making a decision by 2027 on whether to widen the scope of the Baltic Sea Special Area regulations under the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex IV to cover also sewage discharges from cargo ships.
S15	Carry out a study and impact assessment by 2027, assessing the volume and potential harmful effects of grey water and the possibilities for ships to deliver it to port reception facilities or take treatment measures using onboard treatment plants, before discharging it into the sea. Based on the results, take relevant action in making a decision by 2029 on whether and how to manage grey water discharges from ships
S19	Enforce the requirements of the Baltic Sea Special Area under the International Convention for the Prevention of Pollution from Ships (MARPOL) Convention Annex IV and continuously ensure the availability of adequate port reception facilities in passenger ports in the Baltic Sea Area taking into account the “Technical Guidance for the handling of wastewater in Ports of the Baltic Sea Special Area under MARPOL Annex IV”.
S17	Study the adequacy and use of port reception facilities (PRF) for the International Convention for the Prevention of Pollution from Ships (MARPOL) Convention Annex V cargo residues by 2024 and, based on this information, ensure adequate PRFs in Baltic Sea ports for cargo residues classified as non-HME substances under MARPOL Annex V and further ensure incentives for ships to use them by 2027.
S18	Develop a Roadmap to minimize the discharges of food waste into the Baltic Sea and subsequently develop by 2025 a HELCOM Recommendation to encourage voluntary agreements on delivering all food waste from ships to port reception facilities.
S22	Develop a Roadmap by 2025 to reduce the input of pollutants from Exhaust Gas Cleaning System discharge waters, as a minimum in line with existing legislation, taking into consideration the precautionary principle and the outcome of the work of the International Maritime Organization (IMO).
S55	Identify at the latest by 2025, as well as regularly update every two years, mitigation measures according to Best Environmental Practice and Best Available Technique for continuous underwater noise in the Baltic Sea and implement thereafter in line with recommendations and regulations of the international Maritime Organization
S56	Actively support and contribute to the ongoing discussions on underwater noise at the International Maritime Organization (IMO) by, amongst other things, working towards regionally coordinated implementation of actions by 2028.
S57	Start working as soon as possible towards regionally coordinated actions on underwater noise, aiming in the long term towards addressing adverse effects of underwater noise on marine species identified as sensitive to noise, whilst safeguarding the potential of the Baltic Sea for sustainable human activities by: <ul style="list-style-type: none"> a. Supporting a swift implementation of the Regional Action Plan on Underwater Noise. b. Initiating and supporting pilot projects to study efficacy of vessel slowdown, rerouting and other operational measures, on noise emissions and responses of target species by the end of 2026. Results are to be communicated to the International Maritime Organization (IMO) for follow-up and further action. c. By 2027 Mapping the contribution of recreational craft to the noise in the marine environment; supporting studies on efficiency of mitigation measures, such as speed limitations and time-area restrictions; and studies on impact from echo sounders and fish-finders. Based on available evidence and new results, developing guidelines for implementing

regulations to reduce impact on sensitive species. Simultaneously, establishing a discussion with the industry and relevant international standardization bodies and aiming at developing industry or/and application standards for underwater noise emissions of engines with respect to recreational craft, echo-sounders and fish finders, which can be utilized in national regulation of activities in marine protected areas (MPAs) and other noise sensitive areas in the Baltic Sea.

Riga, Latvia, 28-30 October 2025

Document title	Draft HELCOM Recommendation on BAT BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea Region
Code	6-4
Category	CMNT
Agenda Item	Other ship-generated wastes and port reception facilities (including marine litter)
Submission date	7.10.2025
Submitted by	John Nurminen Foundation;CCB
Reference	

Background

The third Informal Consultation Session of the Helsinki Commission (IC HELCOM 3-2025) considered the draft HELCOM Recommendation on BAT/BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports ([document 2-2](#)). The Session recalled that Denmark and Germany had raised concerns at IC HOD 6-2025 regarding the practicability as well as the details of the reporting format of the draft Recommendation. In this regard, the Session considered the two options for the reporting format contained in Annex 2, the original extended one (option 1) and the simplified version drafted by CCB (option 2). The Session further took note of the importance of the document and expressed appreciation to CCB for its efforts. The Session took note of the concerns by Denmark and Estonia regarding the additional administrative burden for the sectors involved associated with reporting. Whilst Denmark saw added value in disseminating the BAT/BEP and encouraging the implementation of the included measures, Denmark found the added value in the reporting less clear. The Session took note of the fact that the majority of countries support option 2 of the reporting format. The Session considered the proposal by Sweden to adopt the document while treating the first reporting round as a test phase to evaluate its practicality and allow for potential revisions, however, Denmark was unable to endorse this approach. The Session noted that while the use of the reporting format in Annex 2 is encouraged, the recommendation allows for flexibility in its application. Finally, the Session recommended to grant IC HOD 8-2025 the mandate to approve the draft HELCOM Recommendation on BAT/BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports. The Session invited Denmark, CCB, and the Secretariat to work intersessionally to refine the reporting format to reduce administrative burdens, with the aim of presenting it at IC WG MARITIME 4-2025 for recommendation for adoption.

Following these discussions and taking into account the publishing of the HELCOM Best Available Technology (BAT) and Best Environmental Practice (BEP) for Minimizing nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea Region ([2024](#)), Annex 1 to the previous version considered by IC HELCOM 3-2025 has been removed, so that the draft Recommendation only refers to it. Furthermore, JNF and CCB present a further updated and simplified draft Recommendation with a reporting format which does not include obligatory reporting.

Action requested

The Session is invited to recommend the adoption of the draft HELCOM Recommendation on BAT/BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea Region.

Draft Recommendation on BAT/BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea Region

[Adopted XX October 2025]

having regard to Article 20, Paragraph 1b)
of the Helsinki Convention

BAT/BEP TO MINIMIZE NUTRIENT LOSSES FROM DRY BULK FERTILIZER STORAGE AND HANDLING IN PORTS IN THE BALTIC SEA REGION

THE COMMISSION,

RECALLING Article 6 of the Convention on the Protection of the Marine Environment of the Baltic Sea Area, 1992 (Helsinki Convention), in which the Contracting Parties undertake to prevent and eliminate pollution of the Baltic Sea Area from land-based sources,

HAVING REGARD also to Article 3(1) of the Helsinki Convention, in which the Contracting Parties shall individually or jointly take all appropriate legislative, administrative or other relevant measures to prevent and abate pollution in order to promote the ecological restoration of the Baltic Sea Area,

RECOGNIZING that in order to prevent and eliminate pollution of the Baltic Sea Area the Contracting Parties shall promote the use of Best Environmental Practice (BEP) and Best Available Technology (BAT) as laid down in Article 3(3) and the criteria for which are specified in Annex II of the Helsinki Convention,

RECOGNIZING ALSO that the updated [Baltic Sea Action Plan \(BSAP\)](#) adopted at the HELCOM Ministerial Meeting 2021 calls for development and introduction of best technologies, techniques and practices (BAT/BEP) to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea region by 2024 (action S21),

ACKNOWLEDGING existing national and international legislation and competences and, for those Contracting Parties being EU Member States, also other relevant national regulations, by-laws and codes of conduct, aiming at preventing further degradation of the marine and freshwater environments and at achieving a healthy sea in good environmental / ecological / chemical status

URGES that the Contracting Parties encourage ports and environmental authorities to utilize the reporting format in Annex 2 to the extent applicable to help and unify ports' environmental control in the Baltic Sea Region.

RECOMMENDS to the Governments of the Contracting Parties to the Helsinki Convention to apply HELCOM BAT / BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the Baltic Sea Region ([2024](#)), based on Annex II of the Convention.

Annex 1 Reporting format for application of BAT/BEP to minimize nutrient losses from dry bulk fertilizer storage and handling in ports in the BSR

1. General					
Country:		Year:			
Facilities		Facility X	Facility Y	Facility Z...	Facility N...
1.	Facility name and harbour/port				
2.	Annual capacity, metric tonnes				
	– Storage, tonnes				
	– Handling, tonnes (export, import)				
3.	Fertilizer type handled, tonnes				
	– Nitrogen (N), tonnes				
	– Phosphorus (P), tonnes				
	– Potassium (K), tonnes				
	– NPK, tonnes				
4.	Environmental permit				
	– Validity (from – to)				
	– Limit values (emissions, discharges)				
	○ <i>Dust,</i>				
	○ <i>N (NNO₂, NNO₃, NNH₃, NTOT)</i>				
	○ <i>P (PPO₄, PTOT)</i>				
	○ <i>Other relevant?</i>				
5.	BAT/BEP applied (Yes, No)				

2. Self-assessment checklist for Facility X, Y, Z... N	
<i>Describe the BAT/BEP applied on the site. (Please tick relevant boxes or add a description)</i>	
(1) Handling and storage of dry bulk fertilisers	
1.1 General handling and storage	
<input type="checkbox"/>	Buckets have a line marked 20 cm below the edge to show the allowable limits of fertiliser carried to prevent spillage during handling.
<input type="checkbox"/>	Wind speed limits implemented that prevent operation above certain wind speeds (often 10-15 m/s).
<input type="checkbox"/>	Transport distance between the ship and the storage destination minimized to ensure a continuous handling process while minimising nutrient losses.
<input type="checkbox"/>	Dusting during loading of cargo diminished by placing the base of the chute next to the cargo or using height adjustable fill pipes/fill tubes/cascade tubes.
<input type="checkbox"/>	Closed conveyor belt systems are used to prevent dusting.
<input type="checkbox"/>	Conveyor belt system is designed with optimal parameters that help in minimising nutrient losses.
<input type="checkbox"/>	Conveyor belts are dry and warm before the cargo is handled to prevent the fertiliser from sticking and leaving residues on the belt. One way to ensure this is by running the belts well before loading.
<input type="checkbox"/>	Regular maintenance checks performed before and after operations to prevent spillages during the handling of cargo. All equipment is working smoothly and dust filters installed in the conveyor belts are still effective.
<input type="checkbox"/>	Bulk cargo is handled in closed containers (mainly suitable for small volumes in cases where the cargo does not need to be stored for long)
<input type="checkbox"/>	Cargo is transported in bags in order to minimise dust formation during cargo handling.
<input type="checkbox"/>	Modern vibrating screens equipped with a dust collector are used during screening to minimise dust spillage.
<input type="checkbox"/>	Dust suppressing techniques are used where possible in the handling equipment (e.g. baghouses, filters, screw conveyors and vacuum systems)
<input type="checkbox"/>	Conveyor belt system with internal speed-dampening mechanisms is used to minimise dusting, e.g. baffles can be used in fill pipes, cascades in tubes or hoppers or a loading head can be used to regulate output speed of cargo.
<input type="checkbox"/>	Scraper blades are used during fertiliser storage and removal from storage, which transport the fertilisers by pushing them upwards, to prevent dust formation by minimising the free fall of the cargo.
1.2 Ship-to-shore loading and unloading of dry bulk fertilisers	
<input type="checkbox"/>	Regular maintenance checks performed on the clamshell buckets before and after operations to prevent spillages during loading and unloading of cargo. During maintenance, check whether the grab still closes tightly.
<input type="checkbox"/>	Crane operators apply a so-called 'dusting off move' before the bucket starts to move to/from the berth for (un)loading,. This decreases the chances of fertilisers dropping during the transportation, as the 'dusting off move' clears fertilisers from the bucket that could potentially fall

<input type="checkbox"/>	The bucket is closed the moment after fertiliser is released and the bucket is brought back to pick up the next batch of fertiliser. The BAT can be applied during loading and unloading of fertilisers. This is especially important for cranes handling lower quality grains which are more sticky, leaving residues of fertilizer in the bucket. In case the bucket is not closed the residues could be released onto the berth.
<input type="checkbox"/>	Area between ship and berth is covered to prevent the grabber from moving over the open water (causing direct spillages in the harbour). An example of a cover is a durable tarpaulin, which is a versatile cover suitable in less windy ports. A more robust prevention cover that can withstand heavier weather conditions is a prevention cover made of wood and steel.
<input type="checkbox"/>	As much as possible closed systems are used. This reduces dust formation and cleaning (which in turn reduces costs), but also increases the productivity since operations are made weather-independent. Examples of closed systems are conveyors, chutes, telescopic arm unloaders, telescopic trim chutes and screw unloaders.
<input type="checkbox"/>	Hatch covers on the ship's cargo hold openings are used. The closed-off holes minimise dust spillages and enables unloading independent of the weather conditions. However, this is only suitable for ships with feeder hole openings on their cargo holds.
<input type="checkbox"/>	Unloading cargo under a roof or a covered berth is used. This is currently seldom implemented. However, it could decrease downtime in operations in case of rainfall. In this way, terminal operators could allocate more time to cargo handling, making sure the process is done with more attention to minimising nutrient losses.
<input type="checkbox"/>	Bulk containers and bulk container spreaders are used. Bulk container spreaders enable the unloading of fertiliser (stored in containers) into the cargo hold by tilting the container and can be used to minimise dust formation.
<input type="checkbox"/>	Dust generation reduced by using wind protection covers. Examples of such covers could be wind barriers or special dust control systems attached to hoppers.
1.3 Onshore vehicles (trains, trucks, cars)	
<input type="checkbox"/>	Loading and unloading of trains takes place in covered areas. This practice prevents dust spreading.
<input type="checkbox"/>	Hard surfaces to the roads are applied. Examples include concrete or asphalt which can be easily cleaned if fertilisers are spilled.
<input type="checkbox"/>	Different vehicles are applied inside and outside the storage buildings to prevent fertiliser residues from being transported out of storage areas with vehicles.
1.4 Storage of cargo	
<input type="checkbox"/>	Fertilisers are best stored in a closed and dry environment to shelter from wind and minimise dust formation. Examples of storage facilities are silos, bunkers, hoppers and containers. The same applies for storing of cleaned cargo residues.
<input type="checkbox"/>	When hoppers are being used to store cargo, electrically closable hoppers are recommended. This is very useful because in the case of quick degradation of weather conditions the system can be shut off rapidly, reducing losses of fertiliser and preventing fertiliser from being damaged.
(2) Cleaning equipment and routines	
2.1 Cleaning of berths and surrounding areas	
<input type="checkbox"/>	Berth is cleaned immediately after each loading and unloading operation, ideally on a more frequent basis throughout the day (e.g. in the breaks between the (un)loading operations). The berth should also always be cleaned before it starts raining or snowing, requiring careful monitoring of the weather forecasts.
<input type="checkbox"/>	A clean-up checklist is applied to control minimising fertiliser spills in the (un)loading and storage area. The checklist specifies the steps that prevent spillages and ensure proper cleaning. This applies to operations performed at the ports and terminals, on board the ship and at the production location. The checklist includes guidelines to follow once spillages occur (specific to all weather conditions). It also serves to keep cleaning standards high in ports where employees rotate frequently.
<input type="checkbox"/>	Cleaning berth and surrounding areas by using (mechanical) sweeping brushes or cleaning equipment with a vacuum function to guarantee better cleaning.
<input type="checkbox"/>	Port and terminal areas cleaned with water only under the condition that this waste water is collected and treated in a wastewater treatment plant.
<input type="checkbox"/>	Collected fertiliser spills are managed according to environmental standards and protocols defined by environmental authorities. The spillage material is properly returned to the manufacturer, reused or properly disposed of.
<input type="checkbox"/>	Cleaning of vehicle tyres is performed, since fertilisers can be spread by vehicles stationed in the port and terminal areas. The spreading of fertiliser can be prevented by vehicle tire cleaning systems. The wastewater from vehicle washing should be collected and treated in a wastewater treatment plant.
2.2 Cleaning of ships	
<input type="checkbox"/>	Cargo residues from ship holds are dry cleaned before they are washed with water. This significantly reduces the amount of nutrients ending up in the cargo hold wash water. Some vessels are only responsible for transporting fertilisers and then sometimes dry cleaning suffices which omits the issue of wastewater discharging at the port of arrival.
<input type="checkbox"/>	Vessels are not allowed to proceed to the next port until all fertiliser spills have been removed from the deck and the gangways by brushes (dry cleaning).
<input type="checkbox"/>	It is ensured that ships can deliver their wash water to the port/terminal and that this can be done in an efficient manner (for example collection trucks are readily available at a given time and terminal). This prevents discharge of nutrient carrying wastewater at sea.
<input type="checkbox"/>	Ships can be cleaned with water only under the condition that this waste water is collected and treated in a wastewater treatment plant. It is currently quite common for ships to go to sea to clean the hold.
<input type="checkbox"/>	The cleaning process of the ship's cargo holds with water is done under high pressure rather than using high volumes of water. This practice reduces the costs of delivering wastewaters and puts less strain on the port reception facilities for hold wash waters. Due to dry cleaning beforehand and high-pressure washing often only being possible in the lower areas of the cargo hold, the reduction of wash water is relatively limited.
(3) Management of stormwater and snow	
<input type="checkbox"/>	Outlets, wells and drainage systems are covered with blind covers before operations to contain the fertiliser on the quay and to ease the cleaning process before the fertiliser enters drainage systems and flows directly into sea.
<input type="checkbox"/>	Stormwater is captured and treated before it is discharged into the sea. In some ports, where fertiliser plants are on the port grounds, the stormwater can be drained and treated at the wastewater plant.
<input type="checkbox"/>	In winter, snow is collected from berths in a dedicated area with appropriate stormwater management to prevent fertiliser spills from entering the sea when the snow melts.
(4) Monitoring of process improvement	
4.1 Monitoring of residues and discharges	

<input type="checkbox"/>	Monitoring of residues in cargo hold wash water of ships mainly transporting fertilisers to measure their contents and use correct disposal methods. Some ports do not accept wash waters from vessels if the exact contents is not known. Therefore this is an important practice.
<input type="checkbox"/>	Monitoring of phosphorus and nitrogen content of stormwater by sampling techniques to measure the amount of pollution discharged into the sea. This data could be further used to estimate the effects of nutrient discharges on the environment in terms of eutrophication.
<input type="checkbox"/>	Monitoring of air quality at the ports' weather station to keep track of the dust particulates in the air. This could aid in monitoring of dust formation due to fertiliser handling. Protocols regarding operations can be put in place when the dust levels exceed limits.
4.2 Monitoring the process	
<input type="checkbox"/>	Continuous monitoring of the work, for example, by cameras and visual inspections. The terminal operator can for example monitor the crane driver performance. Port authorities and terminal operators can monitor the cleaning procedures. In this way, improper performance can be corrected and/or penalised and prevented in the future.
<input type="checkbox"/>	Monitoring of equipment, for example, the dust filters in the machinery, the effectiveness of the closed systems/conveyor belts, the containers, etc. The terminal operators should conduct this monitoring process regularly, at least before and after handling the cargo loads.
<input type="checkbox"/>	Monitoring and forecasting weather conditions can help estimate and determine potential interruptions during work and when cleaning is needed. The port authorities can monitor the weather and terminal operators are also responsible for organising their work and cleaning schedules around the weather forecast. The monitoring and forecasting of weather conditions is also very important for monitoring the concentrations of nutrient discharges in stormwater and can help to control the automatic sampler.
(5) Improving communication between different stakeholders	
<input type="checkbox"/>	Rewarding schemes established for workers to achieve minimal nutrient losses, similar to what is done to reward safety regulations and practices in ports. Rewards can include certain prizes/lunch incentives or bonuses.
<input type="checkbox"/>	BATs/BEPs is a standard component/ requirement for shipment contracts to avoid major nutrient losses during transportation. In this way, handling and storage requirements can be guaranteed. Manufacturers can play significant role in ensuring safe transportation by third parties
<input type="checkbox"/>	Agreements established between port/terminal and shipping company e.g. on specifications for feeder holes for closed loading.
<input type="checkbox"/>	Experiences and good practices are shared with relevant stakeholders, e.g. through a platform to share good practices to boost cooperation.
<input type="checkbox"/>	Good communication between port and terminal established, e.g. to monitor fertiliser losses at a terminal.
<input type="checkbox"/>	Employees provided with regular feedback on their job performance to minimise nutrient losses (e.g. for crane operators).
<input type="checkbox"/>	Monitoring details are shared with operators and authorities to raise awareness and encourage more action to decrease nutrient losses. Monthly goals of nutrient discharge levels can be created to stimulate employees.
<input type="checkbox"/>	Individual conversations are established between port and companies operating in port area about preventing environmental impacts
(6) Developing skills through training and education	
<input type="checkbox"/>	Cargo handling is kept at minimum or even stopped in bad/windy weather conditions. Crews are educated on operations to minimise nutrient losses in bad weather conditions. Operations should be limited if winds exceed 10-15 m/s (depending on the port).
<input type="checkbox"/>	Crane operators trained to close the bucket the moment after the bucket releases the fertiliser and it is brought back to pick up the next batch of fertilisers. This is especially important for cranes handling lower quality grains which are more sticky, leaving residues of fertiliser in the bucket that could be released onto the berth if the bucket is not closed in that moment.
<input type="checkbox"/>	Experienced personnel, both on shore and on board, is ensured. Especially when using older/less innovative equipment that has a higher risk of spillage, training is crucial for careful handling. Combination of well-trained personnel and adequate equipment is ideal.
<input type="checkbox"/>	When new and more efficient equipment is installed and used, personnel is trained in its proper application and maintenance.
<input type="checkbox"/>	Awareness is raised amongst the employees and different stakeholders about the consequences of fertiliser losses, e.g. through workshops where the effects of nutrient losses are explained along with the BATs/BEPs put in place. During this workshop an open, safe space should be created to encourage stakeholders to look ahead and brainstorm together about possible solutions to the problem.
(7) Addressing policy makers and authorities.	
<input type="checkbox"/>	Environmental permits encourage implementing BATs/BEPs to minimise fertiliser losses.
<input type="checkbox"/>	Training materials are provided to ports, terminals, shipping companies, fertiliser manufacturers/owners and can be used during regular audits.
<input type="checkbox"/>	Port is provided with adequate reception facilities for the disposal of hold wash waters; they are enforced and controlled by authorities
<input type="checkbox"/>	Economic incentives introduced to make discharging wash water in ports more financially attractive, e.g. by introducing no-special fee system
<input type="checkbox"/>	Regular audits conducted. Policy makers and authorities support ports and terminals by controlling correctness of such routines

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Code	6-6
Category	CMNT
Agenda Item	Other ship-generated wastes and port reception facilities (including marine litter)
Submission date	7.10.2025
Submitted by	CCB;John Nurminen Foundation
Reference	

Background

This document contains the draft revised HELCOM Recommendation 22/3 on Unified Interpretations to Ensure a Harmonized and Effective Implementation of the Strategy for Port Reception Facilities for Ship-Generated Wastes and Associated Issues.

Since 2022, the John Nurminen Foundation, in cooperation with the Finnish Transport and Communications Agency Traficom, the Swedish Transport Agency, Coalition Clean Baltic, has worked to reduce discharges of harmful substances into the Baltic Sea caused by the tank washing of chemical tankers ([Chemical Tanker Project](#)). The Baltic Sea is one of the world's most sensitive marine ecosystems, yet chemical tankers can legally discharge hazardous and noxious substances daily, worsening its pollution crisis.

Some of these legally discharged chemicals are toxic and/or carcinogenic, and posing significant risks to marine life and food webs. Recent Swedish research ([Larsson et al., 2025](#)) detected large numbers of both legal and illegal discharges of non-petroleum substances from chemical tankers annually in the Baltic Sea, including within marine protected Natura 2000 sites, with an increasing trend. Discharges of vegetable oils, other bio-based oils, and biofuels may be as harmful as petroleum oils to many marine organisms. Data on discharges outside protected areas are limited, but pollutants may travel long distances, potentially impacting sensitive ecosystems.

Different interpretations of the term “**en route**” under MARPOL Annex II have created uncertainty for seafarers regarding when operational discharges are permitted. In some cases, this allows vessels to sail from a port, or deviate from a voyage, solely to discharge noxious substances, provided other discharge criteria are met, which can cause localized pollution. For example, German regulations interpret that a vessel is not considered “en route” if it undertakes a voyage solely to discharge noxious substances. As a result, a vessel departing from a German port for the sole purpose of discharging tank washings is considered not “en route”, minimizing the discharge of hazardous substances, despite other jurisdictions applying a different interpretation.

Based on the collected information and outdated recommendation, this document contains a revision of HELCOM Recommendation 22/3 to support BSAP actions related to other ship-generated wastes and port reception facilities (**Attachment 1**).

Action requested

The Session is invited to consider the draft revised Recommendation 22/3 and if possible, recommend it for approval.