

MEMO OF THE SIXTH INFORMAL CONSULTATION SESSION OF
THE SEA-BASED PRESSURES WORKING GROUP
(IC WG SEA-BASED PRESSURES 6-2025)

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MEMO OF THE SIXTH INFORMAL CONSULTATION SESSION OF THE SEA-BASED PRESSURES WORKING GROUP (IC WG SEA-BASED PRESSURES 6-2025)

Introduction

0.1 The Sixth Informal Consultation Session of the HELCOM Working Group on Reduction of Pressures from Sea-based Sources (IC WG SEA-BASED PRESSURES 6-2025), hosted by Denmark, was held in Helsinki, Finland, from 30 September to 2 October 2025.

0.2 The Session was attended by Delegations from Denmark, Estonia, Finland, Germany, Poland and Sweden, and by Observers from Coalition Clean Baltic. The list of participants is included in **Annex 1**.

0.3 The Session was chaired by Frank Jensen, Denmark.

0.4 Katarina Viik, Professional Secretary and Marta Ruiz, Associate Professional Secretary, acted as secretaries of the Session.

Agenda Item 1 Adoption of the Agenda

1.1 The Session adopted the Agenda as contained in **document 1-1** and noted the annotated Agenda in **document 1-2**.

Agenda Item 2 Matters arising from other HELCOM work

2.1 The Session took note of the information on the memos of recent HELCOM sessions (**document 2-7**) and supported discussing issues of relevance to the Working Group under relevant Agenda Items.

2.2 The Session took note of the national update provided by Poland regarding new macrobenthic stations and the finalisation of the monitoring programme. The Session took note that the programme is expected to be open for public consultation in January 2026. The Session took note that Poland will use their national assessment on benthic habitats since the Common Approach to Seabed Integrity has not been agreed upon regionally.

2.3 The Session took note of the update of the HELCOM Science Agenda (**document 2-4**). The Session discussed the relevance of the current topics for research needs in the Science Agenda under the group's mandate and took note of the following suggestions:

- Poland: was in favour of developing scientific criteria for the designation of no-take zones within marine protected areas. It is also important to investigate the cumulative influence of wind farms on birds, pelagic and benthic species, as well as bats. There are national discussions to include considerations of the effects of higher frequencies (>500Hz) of underwater noise;
- Germany, supported by Denmark: suggested input under Chapter 2.7 on shipping. The suggestion is to take also into account the discharge of microparticles in the evaluation of the impact of in-water cleaning of ship hulls on biocidal and biocide-free anti-fouling systems; and
- Sweden: proposed to consider additional sources of continuous noise, such as ultrasonic hull cleaning devices, and acknowledged that a gap in understanding remains regarding its impacts.

2.4 The Session supported the above suggestions for the update of the HELCOM Science Agenda.

Implementing the 2021 HELCOM Baltic Sea Action Plan (BSAP)

2.5 The Session took note of the BSAP joint actions reporting (**document 2-5**). The Session reviewed the prefilled regional progress and regional assessment for joint BSAP actions as contained in **document 2-5 Rev 1**. The Session noted the guidance by the Heads of Delegation for considering pausing implementation,

adjusting the ambition level or considering work of another organization as sufficient to meet the objectives of BSAP actions. The Session discussed how to reflect the accomplishment of actions with continuous updates as an outcome, and was of the view that these actions could be considered accomplished once a system for updates is established. The Session supported sharing these views with HODs for consideration.

2.6 The Session took note that, following discussions at IC WG SEA-BASED PRESSURES 5-2025 regarding the guidance on reporting for the implementation of national BSAP actions to the HELCOM Explorer¹, the matter was further discussed by IC WG GEAR 8-2025² and IC HOD 7-2025. The Guidance for national BSAP action reporting ([document 2-21](#)) and the reporting template with additional action-specific guidance ([Attachment 1](#)) were recommended for use in the reporting process due by 31 October 2025³.

2.7 The Session noted that Observers were kindly invited to provide input through Working Groups on their contribution or testimonials on the implementation of the BSAP by 2 September 2025. No input from Observers was provided in advance of the Session. The Session reiterated the invitation to interested Observers to suggest a topic that could be developed into a testimonial or contribution to the brochure for the 2026 Ministerial Meeting or used in other HELCOM communications, for example, on the HELCOM website and contact the Secretariat (eeva.nyssonen@helcom.fi) by **30 November 2025**.

2.8 The Session took note that the Guidance for incorporating climate change considerations in the review and update processes of HELCOM policies was approved by IC HOD 7-2025⁴, and subsequently through the correspondence procedure in June 2025. Any new or updated HELCOM policy being brought forward to HOD/HELCOM for adoption is to include a confirmation that it has undergone 'climate-proofing' according to the guidelines. The guidelines are scheduled for a review three years after their adoption, i.e., by 2028.

2.9 Recalling previous considerations at Sea-based pressures Working Group sessions⁵ on the draft cross-referencing of the Global Biodiversity Framework (GBF) Targets and the 2021 BSAP actions, the Session took note that IC WG GEAR 8-2025⁶ had noted progress and input from Working Groups on describing how HELCOM work could be communicated to contribute to CBD GBF targets ([document 13-2](#)). It supported the proposal by IC WG BIODIV 5-2025 to provide the information to national focal points for CBD reporting, considering the current version of the overview appropriate to share with national focal points

HOLAS 4

2.10 The Session took note of an update on preparatory work towards HOLAS 4 (**document 2-8**). In this regard, and recalling considerations at IC WG SEA-BASED PRESSURES 5-2025 on holding HOLAS-related workshops on spatial data layers and maps, and cumulative impacts, the Session took note that IC WG GEAR 8-2025 recommended expanding the list of invited experts for the relevant upcoming PROTECT BALTIC workshops on sensitivity score method development for SPIA workshops to WG GEAR contacts.

2.11 The Session took note of the discussion regarding breakup of thematic assessment reports in HOLAS 4, noting that any developments in habitat mapping or changes in how habitats are considered should also be reflected in noise assessments. The Session discussed how this aspect is integrated into the thematic breakup. The Session noted that HOLAS 4 is in the development phase until the end of 2026, after which a series of workshops will address cross-cutting matters. The Session further noted that another option addressing cross-cutting matters could be the use of the SPIA tool and the inclusion of supporting contextual information related to gaps, for example, to policy.

2.12 The Session took note of the proposal to harmonize HELCOM Assessment Scale Level 4 (**document 2-9**). The Session further took note of Poland's study reservation to be further tackled at the upcoming session of the Source-to-sea Working Group. The Session acknowledged that this issue can affect the confidence of the assessment, as data from only a lower number of stations may be available, and

¹ [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 3.5-3.6.

² [Memo of IC WG GEAR 8-2025](#), para. 5.3-5.5.

³ [Memo of IC HOD 7-2025](#), para. 2.79.

⁴ [Memo of IC HOD 7-2025](#), para. 2.81-2.82 and [document 2-20](#).

⁵ [Memo of IC SEA-BASED PRESSURES 2-2023](#), para. 3.11-3.13; [Memo of IC WG SEA-BASED PRESSURES 3-2024](#), para. 2.9-2.10; [Memo of IC WG SEA-BASED PRESSURES 4-2024](#), para. 2.6; [Memo of IC WG GEAR 7-2024](#), para. 2.3-2.5) and [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 3.4.

⁶ [Memo of IC WG GEAR 8-2025](#), para. 13.17.

considered that it should be examined across all relevant MSFD indicators and criteria, for example D1, D5, D6 as well as D7.

2.13 The Session took note of the core needs for human activity and pressure maps for Spatial distribution of Pressures and Impacts Assessment (SPIA) to be included as part of the upcoming HOLAS 4 thematic assessments (**document 2-1**).

2.14 The Session considered the questions in the document and provided ideas on how the group could contribute to this work as follows:

- seabed mining and CCS could be considered in the future;
- EG Marine Litter and EG Submerged could provide relevant data;
- there will be a workshop on sensitivity scores in the frame of the PROTECT BALTIC. The Session invited the Secretariat to disseminate information regarding the workshop to the Group;
- using common temporal and spatial scales allows for a Baltic-wide cumulative impact assessment, which provides more meaningful results than thematic assessments alone;
- it would be desirable to include climate change in the assessments. The Session took note of the clarification that marine heatwaves will be considered, given the good availability of data. In addition, the Session noted the clear benefits of projecting future changes, recognising additional burdens on the SPIA tool;
- a drafting group is working on the update of reporting guidelines for MSFD Article 8, in which climate change will be included. The Session recommended aligning this work with HOLAS 4 work on the matter;
- under the Nature Restoration Law, it is necessary to demonstrate which pressures are impacting benthic habitats and how these habitats can be restored;
- submerged hazardous objects should also be examined;
- given the geopolitical situation, the availability of certain data for public use may be subject to limitations due to security or other reasons;
- the best available data should be used and aligned with the data applied in other indicators' work, making use of established dataflows and streams. The Session noted the need for additional data beyond indicators, such as climate change and heatwave data. The Session further noted ongoing projects, including ANYSBP under DG MARE, which promote knowledge exchange through questionnaires and planned workshops;
- the need for more direct communication with expert groups was emphasised. The Session took note that it is envisaged to contact them in due course;
- the next MSFD assessment guidance on Article 8 reporting will cover 2022–2027. The Session was of the view that HOLAS 4 should support national reporting for the MSFD, with SPIA ensuring key data are included, and that pressures are assessed separately (e.g., noise and mammals, physical pressures and benthic habitats);
- analysing the efficiency of measures under the BSAP to identify which actions should be prioritized;
- when considering the marine litter component as a pressure layer, the Session noted limited data availability for Baltic-wide assessments of marine litter and microplastics, with monitoring approaches differing across countries. The Session took note of a study on microlitter in bivalves in Germany conducted in accordance with HELCOM guidelines. The Session invited EG Marine Litter to examine this matter further.

2.15 Following previous Sea-based pressures Working Group sessions⁷, the Session took note that there has been no progress concerning the availability of the additional noise data from HOLAS 3 assessment results in the HELCOM Map and Data Service (MADS), and invited the Secretariat to liaise with Germany to further advance on this matter.

Monitoring

2.16 The Session took note of the status of the revision of the HELCOM Monitoring Manual (**document 2-2**). The Session invited Contracting Parties to review the HELCOM monitoring programmes under its remit by **14 October 2025**, using the [dedicated workspace](#).

2.17 The Session took note that the following programmes, under the remit of the group, do not have a lead for their revision:

- Macrolitter characteristics and abundance-volume-floating litter;
- Macrolitter characteristics and abundance-volume-litter in biota; and
- Macrolitter characteristics and abundance-volume-litter on the seafloor.

2.18 The Session invited Contracting Parties to take the lead in reviewing these programmes and inform the Secretariat accordingly (Susanna.Kaasinen@helcom.fi). The Session noted the timeline and the aim to submit the monitoring programs to the next session of the Heads of Delegation in December 2025.

RAP on Hazardous Substances

2.19 The Session considered the draft Regional Action Plan on Hazardous Substances (**document 2-3 Rev. 1**) and commented as follows:

- Germany suggested rewording action S22a to read as follows, so that the text is aligned with the scrubber roadmap under development in the WG Maritime:

“Develop a HELCOM Recommendation for preventing the discharge from the use of Exhaust Gas Cleaning Systems (EGCS) in territorial seas, internal waters and ports in the Baltic Sea, and a joint proposal to the IMO to take the necessary measures to prevent the discharge from the use of EGCS in the Baltic Sea.”

“S22a Rationale: Inputs information gathered during the primary run of the HELCOM strategic approach highlighted that discharge waters from Exhaust Gas Cleaning Systems account for a significant proportion of the overall inputs of PAHs to the Baltic Sea – as well as a considerable proportion of the overall inputs of several metals in the HELCOM list of priority substances. An effective measure on this source of inputs is needed towards an overall reduction of the inputs of these priority substances to the Baltic Sea.”

“In fact, the (draft) roadmap under S22 includes both a recommendation regarding territorial seas, internal waters and ports (short term, towards regionally harmonized ban for the discharges) and joint efforts to regulate the issue in the Baltic Sea (at least in the PSSA) through the IMO (longer term).”
- Poland: from a monitoring perspective, the Polish authority agreed on most actions except the last two, noting that knowledge is too low for regular monitoring;
- Finland: drafting the action plan during the ongoing BSAP implementation may cause confusion in national processes; and
- CCB: suggest applying consecutive numbering when numbering actions in the RAP HAZ, while retaining references to BSAP actions in brackets, to avoid confusion.

2.20 The Session invited Contracting Parties to review the draft Regional Action Plan on Hazardous Substances and inform the Secretariat accordingly by **14 October 2025** (vasileios.kouloumpos@helcom.fi).

⁷ [Memo of IC WG SEA-BASED PRESSURES 3-2024](#), para. 2.14-2.17; [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 3.13.

HELCOM Recommendations

2.21 The Session took note of the internal guidance on harmonizing the drafting of HELCOM Recommendations (**document 2-6**).

2.22 The Session welcomed the internal guidance and its connection to the BSAP, noting that such consistency supports clarity and understanding.

Agenda Item 3 Underwater Noise

3.1 The Session took note that the status of implementation of actions in the RAP Noise has been updated based on the input from the IC WG SEA-BASED PRESSURES 5-2025, and made available on the [HELCOM website](#).

3.2 The Session took note of the Memo of the third Informal Consultation Session on the Implementation of the Regional Action Plan on Underwater Noise (IC RAP Noise 3-2025) (**document 3-6**).

3.3 The Session took note of Poland study reservation on document 3-6 due to its late submission, to be clarified by **14 October 2025**.

3.4 Following considerations at IC RAP Noise 3-2025, the Session recommended the establishment of an online platform to share best practices on policy options related to underwater noise structure on the HELCOM website in connection with action 31 of the RAP Noise, pending Polish study reservation. The Session discussed dedicating resources to the establishment and maintenance of the above-mentioned online platform.

3.5 Following the recommendations by IC RAP Noise 3-2025, the Session took note that the proposed platform scheme will be submitted to the next session of EG Noise dedicated to underwater noise indicators for additional input.

3.6 The Session considered merging EG Noise sessions to address underwater noise indicators, assessments, and implementation of the RAP Noise and recommended starting with this approach in 2026, pending Polish study reservation.

3.7 The Session took note of the information on the DEMASK project as contained in **document 3-5**. The Session took note of Poland's remark that similar cooperation takes place at the regional level between HELCOM, OSPAR and ICES, with Polish experts engaged in these groups to provide information on monitoring and assessment.

Indicators on underwater noise

3.8 The Session took note of the notes of the ICES and OSPAR Workshop on enhancing AIS (Automatic Identification System) and VMS (Vessel Monitoring System) data to improve the quality of continuous underwater noise data, held online on 12 June 2025 (**document 3-3**).

3.9 The Session took note that no additional information on work conducted and the latest developments on HELCOM underwater noise indicators were provided.

3.10 The Session recalled that Germany had confirmed it would continue as lead for the impulsive noise indicator in preparation for and during HOLAS 4⁸. The Session invited additional underwater noise indicator leads and co-leads to confirm their availability to lead the process towards and during HOLAS 4 and inform the Secretariat (marta.ruiz@helcom.fi) accordingly at their earliest convenience.

Implementation of the actions in the Baltic Sea Action Plan related to underwater noise

3.11 The Session discussed the update of the work conducted on the implementation of the BSAP actions related to underwater noise since IC WG SEA-BASED PRESSURES 5-2025 (**document 3-1**), took note of national actions contributing to the process and recommended next steps for implementing these actions as contained in **document 3-1 Rev. 1**.

3.12 The Session took note that the EKLIPSE report, which contains information on impacts relevant to Descriptor 11, is expected to be published in October 2025 and is still under review. The Session further

⁸ [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 5.18.

noted that the report addresses impacts across all MSFD descriptors, including cumulative and cascading effects.

3.13 The Session took note of the further developed draft Guidelines for the design and use of acoustic deterrent devices (**document 3-2**).

3.14 The Session took note that Denmark and Germany recommend the approval of the draft Guidelines.

3.15 The Session took note of the Swedish input to the draft Guidelines to reflect the use of ADDs in very small coastal areas in Swedish waters as contained in **document 3-8**.

3.16 The Session recommended holding an additional drafting group session to address Sweden's comments and to finalise the draft Guidelines. The Session invited Sweden to nominate additional experts to participate in the additional drafting group session, and inform the Secretariat (marta.ruiz@helcom.fi) accordingly. The Session invited EG Noise to contribute to the finalisation of the draft Guidelines in case the drafting group is not available for conducting this work.

3.17 The Session recommended, in principle, the approval of the draft Guidelines, pending the consideration of the Swedish input. The Session further recommended the completion of the joint component of BSAP action S61, with the understanding that full implementation of the action requires national adoption of the guidelines.

Report on the activities of EG Noise

3.18 The Session took note of the report on current activities of HELCOM EG Noise (**document 3-4**).

3.19 The Session took note of the information by CCB on the side event at UNOC3 in Nice, 9-13 June 2025: "Quiet Seas in a Climate Transition: Aligning decarbonisation with Ocean Health" (**document 3-7**).

Agenda Item 4 Marine litter

Tracking the implementation of the Regional Action Plan on Marine Litter (RAP ML)

4.1 The Session took note that the status of implementation of actions in the RAP ML was updated based on the input by IC WG SEA-BASED PRESSURES 5-2025 and made available on the [HELCOM website](#).

4.2 The Session considered the following draft documents (**document 4-2**) as outputs of actions RS6-RS10:

- an inventory of best practices of the collection and separation of ALDFG/EOLFG (RS6, attachment 1 and appendix 1);
- elaboration of guidelines for reducing the input of ALDFG from recreational fisheries to the Baltic Sea with a special focus on gillnets (RS7, attachment 2);
- report on lost angling gear (RS8, attachment 3);
- best practices of fishing gear marking (RS9, attachment 4); and
- innovative features as a tool to prevent and reduce the loss of fishing gear and risk of ghost fishing (attachment 5).

4.3 When considering the draft outputs, the Session took note of Germany's concern regarding the inclusion of estimates of angling data based on rough assumptions. The Session further took note that Sweden also had additional input to the draft documents.

4.4 The Session took note of the German and Swedish input to the draft documents as contained in **document 4-2 Rev. 2, Attachments 1-3**.

4.5 The Session recommended the approval of the draft documents as contained in **document 4-2 Rev. 3, Attachments 1-3 and document 4-2, Attachments 4 and 5**.

4.6 The Session discussed how actions are to be considered accomplished. The Session noted that implementation plans for the different actions have final outcomes and that actions should be regarded as accomplished once the outcomes are achieved.

4.7 The Session took note of Sweden’s view that the documents should be regarded as knowledge-based reports, while noting that not all RS6-RS10 actions of the RAP ML can be considered accomplished.

4.8 The Session invited EG Marine Litter to consider whether actions RS6-RS10 can be considered accomplished with the recommendation for approval of the draft documents as contained in **document 4-2 Rev. 3, Attachments 1-3 and document 4-2, Attachments 4 and 5**. The Session further invited EG Marine Litter to draft a reporting template to follow up on the implementation of the actions once accomplished.

4.9 The Session considered the information on the PERMAGOV ALDFG product scoping (**document 4-1 and Presentation 1**), discussed the potential ALDFG action topics and welcomed them.

4.10 The Session considered holding a dedicated workshop to further discuss potential ALDFG action topics towards the third RAP ML and supported it.

4.11 In relation to the sharing of lost gear data obtained through digital logbook submissions, the Session took note of the following views:

- Denmark and Sweden are willing to share data on digital logbooks, provided compliance with GDPR requirements;
- under EU rules, vessels under 12 metres will be required to share such information with the EU and the Commission from 10 January 2026, while no obligation exists for sharing the data among EU Member States; and
- countries might have difficulties in delivering data to different institutions in varying formats. The Session discussed developing a common data reporting approach. The Session invited the PERMAGOV project to further explore what kind of information is necessary and to clearly state the purpose for requiring such data.

4.12 The Session took note of the information on a short visionary film illustrating a future where plastic use is sustainable (**document 4-3**).

4.13 The Session took note of the report “Microplastics and rubber in sediment in road run-off treatment systems” by Sweden (**document 4-4**).

4.14 The Session took note of the report “Plastic in Sweden – from production to recycling” (**document 4-5**).

Implementation of the HELCOM Recommendation on the reduction of releases of EPS and XPS to the Baltic Sea

4.15 The Session took note of the Guidelines on the reduction of the releases of EPS and XPS to the Baltic Sea, which are now available on the [HELCOM website](#).

Marine litter indicators

4.16 The Session took note that the HELCOM Guidelines for monitoring of beach litter were approved through a correspondence procedure by WG Sea-based pressures in May 2025, and are now available on the [HELCOM website](#).

4.17 The Session took note that the final report on “the implementation of the Guidelines on monitoring of microlitter in biota of the Baltic Sea: Bivalves” was approved through correspondence procedure by WG Sea-based pressures in May 2025 and is now available on the [HELCOM website](#).

4.18 The Session took note that the draft policy brief on monitoring of marine microlitter in mussels was approved through correspondence procedure by HELCOM Heads of Delegation in June 2025 and is now available on the [HELCOM website](#).

4.19 The Session took note that the final report on the evaluation of the UNEP/MED Guidelines for monitoring riverine inputs of marine litter was approved through correspondence procedure by WG Sea-based pressures in May 2025 and is now available on the [HELCOM website](#).

4.20 The Session took note that no information was provided by Contracting Parties and Observers on marine litter monitoring activities.

Global and EU processes on marine litter in connection with HELCOM work

4.21 The Session took note of and appreciated an update on the global and EU processes in connection with HELCOM work on marine litter (**document 4-6**).

4.22 The Session took note that the OSPAR report on the clean-up of plastic pellets washed ashore following the collision between the Stena Immaculate tanker and the containership Solong in the North Sea in March 2025 is not available yet.

Agenda Item 5 Physical damage to the sea floor

Baltic Sea Environmental Fact Sheets on dredging/depositing operations at sea in 2023

5.1 The Session took note that the draft Baltic Sea Environmental Fact Sheet (BSEFS) for Depositing of Dredged Material in the Baltic Sea for the period 2013-2023 was approved through correspondence procedure in June 2025 and is available on the [HELCOM website](#).

5.2 The Session took note of the Memo of the 11th informal consultation session of the HELCOM Expert Group on dredging/depositing operations at sea held online on 22 September 2025 (**document 5-4**).

5.3 The Session considered the discussions held at IC EG DREDS 11-2025 in relation to the possibility of making the reporting of dredging events not connected to disposal events (including small-scale dredging) publicly available at the HELCOM website.

5.4 When considering the possibility of making this data publicly available, the Session noted that Poland is not collecting data on small-scale dredging activities and that national legislation would need to be amended, as permits are currently required only for disposal activities. The Session further noted that Germany is collecting such data, and considered that making this information publicly available, even if gaps remain in other countries, could encourage other countries. Finally, the Session took note of the study reservations expressed by Denmark and Estonia regarding this matter.

5.5 The Session supported making this data available, subject to study reservations expressed by Denmark and Estonia, which are to be clarified by **1 November 2025**.

5.6 The Session supported adding text to the metadata in the datalayer to be added to HELCOM MADs, in order to reflect the differences among countries regarding national reporting of small-scale dredging. The Session took note of the text proposal to read as follows:

“This data layer contains national information on dredging events where the material is not disposed at sea. Please note that this data collection is not conducted in all HELCOM countries, as this is not required under their national legislation, or the data might be unavailable for other reasons.”

5.7 The Session invited Contracting Parties to provide input to the text proposal by **1 November 2025**.

5.8 The Session took note of CCB’s view, encouraging all Contracting Parties to consider revising their national procedures for collecting data on small-scale dredging activities, for the purpose of enabling a holistic assessment of the Baltic Sea ecosystem health.

5.9 The Session took note that the Chair of EG DreDS encourages Contracting Parties to take an active role in the work of the Expert Group.

5.10 The Session noted CCB’s observation that Poland may not have small-scale activities due to the open nature of its coastline, while recalling that on the western side of the Baltic, a large number of small marinas are present.

Consolidated report to LC/LP on depositing dredged material at sea in 2023

5.11 The Session recalled that according to HELCOM Recommendation 36/2, the HELCOM Secretariat is to annually prepare a consolidated report to the London Convention on behalf of the Contracting Parties to the Helsinki Convention, as per the procedure outlined in the HELCOM Guidelines for Management of Dredged Material at Sea and submit it to the Secretariat of the London Convention.

5.12 The Session took note that the draft consolidated report to the London Convention/London Protocol (LC/LP) on depositing dredged material at sea in 2023 was approved through correspondence in June 2025 and subsequently forwarded to the Secretariat of the London Convention.

Other matters related to seabed loss and disturbance

5.13 The Session took note of an update on the implementation of actions in the BSAP related to seabed loss and disturbance since IC WG SEA-BASED PRESSURES 5-2025 (**document 5-1**) and recommended next steps for implementing the seabed loss and disturbance actions as contained in **document 5-1 Rev. 1**.

5.14 In relation to action B26, the Session invited the HELCOM WG BioDiv to co-organize, together with HELCOM WG Sea-based pressures, a workshop on threats to key ecosystem components.

5.15 The Session considered future needs to review the [Guidelines for Management of Dredged Material at Sea](#), based on national experiences in applying them, but did not express any views on the matter.

5.16 The Session invited Contracting Parties and observers to take the lead in implementing BSAP actions related to seabed loss and disturbance.

5.17 The Session noted that no additional information, in addition to the one provided in the document 5-1 Rev.1, was provided on national activities contributing to the implementation of the seabed loss and disturbance-related actions in the BSAP.

5.18 The Session took note of the PERMAGOV common approach to seabed integrity (**document 5-2 and Presentation 2**).

5.19 The Session took note of the views by Germany on the need for coherence in the definition of seabed loss and disturbance.

5.20 The Session took note of the support expressed by Sweden for alignment with Descriptor 6 of the MSFD.

5.21 The Session recommended convening a dedicated online HELCOM workshop in **March 2026** on BSAP S65. The Session invited PERMAGOV to further develop the current outline into an annotated outline, in preparation for the workshop. The Session further requested clear communication on the topics and types of experts expected at the workshop, to ensure the involvement of broad HELCOM expertise (e.g., EG DreDS chair, EG Benthic chair).

5.22 The Session considered the draft review of HELCOM Recommendation 17/3 on information and consultation regarding the construction of new installations affecting the Baltic Sea as contained in **document 5-3**.

5.23 The Session noted that Poland welcomed the decision to initiate work on this matter, but expressed concern that the proposal goes too far. While acknowledging the relevance of large infrastructure projects with transboundary effects, the Session noted Poland's view that the scope of the recommendation is broader than necessary. Additionally, the proposed reporting format requests excessive information, which is not required by the Espoo Convention, creating an additional administrative burden on the Contracting Parties.

5.24 The Session invited Contracting Parties to provide input to the draft review of HELCOM Recommendation 17/3 by **15 October 2025** and inform the Secretariat accordingly (marta.ruiz@helcom.fi). The Session further invited Poland and CCB, assisted by the Secretariat, to further develop the document for submission to the session of the Heads of Delegation to be held in December 2025.

5.25 Contracting Parties did not share information on relevant activities related to the work of the Expert Group on Benthic Habitats and Biotopes (EG BENTHIC) and the EU Technical Group on seabed habitats and sea-floor integrity (TG Seabed).

5.26 Contracting Parties did not share information on best practices and solutions for reducing seabed loss and disturbance.

Terms of Reference

5.27 The Session noted that the draft workplan 2025-2027 and the draft revised Terms of Reference (ToR) for EG DreDS were approved through correspondence by WG Sea-based pressures in June 2025 and are now available on the [HELCOM website](#).

Agenda Item 6 Non-indigenous species (NIS)

Activities of JEG NIS

6.1 The Session took note of the Memo of the Third Informal Consultation Session of the Joint Expert Group on non-indigenous species (IC JEG NIS 3-2025) held in London, UK, on 23 September 2025 (**document 6-1**). When considering the recommendations from IC JEG NIS 3-2025, the Session supported holding an online discussion on the development of the SPIA tool. The Session further supported holding an online discussion, if needed, on the NIS data period for HOLAS 4.

6.2 The Session took note of the clarification that the BSEFS on NIS to be developed is not intended as a substitute for the NIS indicator report, but rather to raise general awareness of non-indigenous species in the Baltic Sea.

6.3 The Session noted the risks related to AquaNIS's long-term operability in connection with HOLAS 4.

6.4 The Session noted the different methodology between OSPAR and HELCOM in conducting the NIS assessment. In particular, OSPAR assesses NIS trends, whereas HELCOM assesses whether there have been new introductions during the assessed period.

6.5 The Session took note of the Memo of the Joint Session of the Joint Task Group on Ballast Water Management Convention (BWMC) and Biofouling and the Joint Expert Group on NIS (IC JTG BALLAST & BIOFOULING & JEG NIS 1-2025) (**document 6-2**) held in London, UK, on 24 September 2025.

6.6 The Session noted that, following considerations at IC WG SEA-BASED PRESSURES 5-2025⁹, the three BSEFS on NIS were removed from the HELCOM website.

6.7 The Session took note that Contracting Parties nor observers provided any additional information on the latest activities related to NIS.

6.8 In relation to the proposal for establishing an Intra North Sea Ballast Water Contingency and Compliance Area in accordance with BWM 2/Circ.62 and MEPC.38(81), the Session noted that the contingency and compliance area has been established in June 2025, and that the decision is published on the [OSPAR website](#), with Contracting Parties planning to communicate it to the IMO. The area was designated for five years, with a plan to review it annually and improve the map, in particular to show the location of marine protected areas (MPAs). The decision already stipulates that ballast water exchanges cannot occur in MPAs, although this is not visually reflected on the map. A request was also made at OSPAR 2025 for an additional environmental impact assessment of the designated area to be conducted over the next intersessional period. The intention is to have an assessment of the risks associated with Ballast Water Exchange plus Ballast Water Treatment (BWE+BWT) completed before the EIHA 2026, along with the map improvements. The Netherlands plans to contact all OSPAR members involved to further develop this subject.

6.9 The Session invited JTG Ballast & Biofouling to track the use of the contingency area.

Agenda Item 7 Submerged hazardous objects, munitions and wrecks

Report of the activities of EG SUBMERGED

7.1 The Session recalled that the 8th informal consultation session of the HELCOM Expert Group on Environmental Risks of Submerged Objects (IC EG SUBMERGED 8-2025) will be held online on **17-18 November 2025**.

7.2 The Session took note that the revised HELCOM Submerged Assessment – Warfare Materials in the Baltic Sea (volume 1) was approved by WG Sea-based pressures in June 2025 and is now available on the

⁹ [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 7.6.

[HELCOM website](#). The Session took note that the HELCOM Submerged Assessment – Wrecks in the Baltic Sea (volume 2) was approved by WG Sea-based pressures in June 2025 and is now available on the [HELCOM website](#).

7.3 The Session took note of the status of work of the [MUNIMAP](#) (Baltic Sea Munitions Remediation Roadmap), [MUNI-RISK](#) (Risk assessment of sea-dumped munitions in the Baltic Sea) and [MMinE-SwEEPER](#) (Marine Munitions in Europe - Solutions with Economic and Ecological Profits for Efficient Remediation) projects. The Session took note that these three projects organized a stakeholder workshop at the Kiel Munition Clearance Week, which took place on 18 June 2025 in Kiel, Germany.

7.4 The Session took note that HELCOM Secretariat, together with the Federal Ministry of Education and Research (BMBF), the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV) of Germany, and GEOMAR Helmholtz Centre for Ocean Research Kiel, organized a side event at the 2025 UN Ocean Conference in Nice, France. The event, titled [No Time to Waste: Tackling submerged munitions in European seas](#), took place on 11 June 2025, from 18:00 to 20:00, onboard the German research vessel *Meteor*.

7.5 The Session invited EG Submerged to consider preparing a short oral brief for EG Submerged sessions on how Contracting Parties address the issues of dumped munitions and wrecks, including approaches to prioritisation, techniques applied in different countries, and related costs. The Session encouraged EG Submerged to work closely with the MUNIMAP, MUNI-RISK and MMinE-SwEEPER projects.

Agenda Item 8 Hot spots

Implementation of the actions in the Baltic Sea Action Plan related to hot spots

8.1 The Session took note of the Joint PA Nutri and PA Hazards workshop on the new criteria for sea-based hot spots held on 17 September 2025 (**document 8-1**). The Session acknowledged the contribution of the workshop in supporting HELCOM Contracting Parties to apply the criteria and compile draft lists of possible hot spot candidates.

8.2 The Session took note that Finland welcomed the event, which also addressed issues related to wrecks and dumped munitions. The workshop discussed, among other topics, whether dumping sites of dredged materials could be designated as hotspots and exchanged views on this matter.

8.3 The Session took note that further work on marine litter hotspots is envisaged as part of the revision of the RAP ML.

Agenda Item 9 Any other business

9.1 Following the considerations at the previous WG Sea-based pressures sessions¹⁰ on matters related to carbon capture and storage (CCS), the Session took note that IC HOD 7-2025 considered the matter further and recommended approval of the draft Terms of Reference (ToR) and guidance for conducting the analysis of environmental and cumulative impacts and risks of CCS in the Baltic Sea context¹¹. In this context, the Session took note of the initiation of work on the analysis of environmental and cumulative impacts and risks of CCS in the Baltic Sea, and of the agreed process for moving forward as contained in **document 9-1**.

9.2 The Session took note of CCB's view that the composition of the informal correspondence group is currently dominated by geological expertise, with comparatively limited representation from the environmental field. The Session acknowledged the need to ensure a more balanced distribution of expertise to support a neutral and comprehensive consideration of the topic. The Session proposed to ask HODs to evaluate the current representation within the group and to consider whether further environmental expertise may be needed.

9.3 The Session took note of the position of CCB and its members in relation to CCS activities in the Baltic Sea (**document 9-3**). The Session further took note of CCB's call for compliance with the Helsinki and

¹⁰ [Memo of IC WG SEA-BASED PRESSURES 3-2024](#), para. 9.1-9-7; [Memo of IC WG SEA-BASED PRESSURES 4-2024](#), para. 9.2-9.5; and [Memo of IC WG SEA-BASED PRESSURES 5-2025](#), para. 10.1-10.8.

¹¹ [Memo of IC HOD 7-2025](#), para. 2.88-2.91 and [document 2-22](#).

Espoo Conventions, as well as HELCOM Baltic Sea Action Plan, when it comes to implementing any new large-scale offshore infrastructure projects.

9.4 The Session took note that Poland expressed the hope that the legal analysis initiated by HELCOM, together with the work of the informal correspondence group, would contribute to resolving the issue.

9.5 The Session took note that the document will be further developed by CCB with the aim of submitting it to HOD, reflecting the view that all policies under HELCOM should be climate-proofed.

9.6 The Session took note of carbon capture plans in Danish waters in the North Sea catchment area; however, no further details were provided at this stage.

9.7 The Session took note of the position of CCB and its members in relation to new oil and gas extraction in the Baltic Sea (**document 9-2**) and that any new development in this field goes against the agreement to align HELCOM policies with climate adaptation and mitigation policies.

9.8 The Session took note that the list of official contacts for WG Sea-based pressures can be easily accessed from the [HELCOM Meeting Portal](#) and that a list of contacts is therefore no longer annexed to the memo.

9.9 The Session did not discuss any other business.

Agenda Item 10 Future work and sessions

10.1 The Session recalled that IC RAP ML 5-2026 is to be held on **20 April 2026** and IC WG SEA-BASED PRESSURES 7-2026 on **21-23 April 2026**. The Session took note that Germany informed IC HOD 7-2025¹² that they are able to host both sessions, as in-person sessions, tentatively in Hamburg. The Session took note of the confirmation from Germany that both sessions will be held in Hamburg, at the premises of BSH.

10.2 The Session recalled that IC WG SEA-BASED PRESSURES 2-2023 considered that having the physical session of the Working Group each spring and an online session each autumn implies that the workshops on the implementation of the RAP ML will be held physically whereas those on the implementation of the RAP Noise will always be held online, and thus recommended that the workshops are held physically once every two years¹³.

10.3 The Session welcomed the offer by Estonia to host IC WG SEA-BASED PRESSURES 8-2026 and IC RAP Noise 4-2026 as back-to-back online meetings.

10.4 The Session recommended IC RAP Noise 4-2026 to be held back-to-back with IC WG SEA-BASED PRESSURES 8-2026, scheduled to take place online, tentatively on **5-8 October 2026**.

Agenda Item 11 Memo of the Session

11.1 The Session approved the draft Memo of the Session.

11.2 The Memo of the Session was finalized by the Secretariat and shared with the participants.

¹² [Memo of IC HOD 7-2025](#), para. 2.24.

¹³ [Memo of IC WG SEA-BASED PRESSURES 2-2023](#), para. 11.5-116.

Annex 1 List of participants

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