

# Memo of the Seventh Informal Consultation Session of the Heads of Delegation (IC HOD 7-2025)

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## Memo of the Seventh Informal Consultation Session of the Heads of Delegation (IC HOD 7-2025)

### Introduction

0.1 The Seventh Informal Consultation Session of the HELCOM Heads of Delegation (IC HOD 7-2025) was hosted by the Lithuanian Chairmanship of HELCOM and was held online from 3 to 4 June 2025.

0.2 The Session was attended by participants from all Contracting Parties except for Russia and by Observers from Coalition Clean Baltic (CCB) and Cruise Line International Association (CLIA). The list of participants is contained in **Annex 1** to this Memo.

0.3 The Session was chaired by the Chair of the Helsinki Commission, Vitalijus Auglys, Lithuania.

### Agenda Item 1 Adoption of the Agenda

1.1 The Meeting adopted the Agenda (document 1-1) with the addition by the EU under Agenda Item 5 to provide an update on the next “Our Baltic” conference planned for 30 September 2025 in Stockholm, and the request by Sweden to Denmark to provide an update on the bilateral intercalibration of the Water Framework Directive (WFD) on coastal waters under Agenda Item 5.

### Agenda Item 2 Matters arising from the HELCOM Groups

#### *WG Fish*

2.1 The Session took note of the Memo of the Fifth Informal Consultation Session of the HELCOM Working Group on Ecosystem-based Sustainable Fisheries (IC WG FISH 5-2025), which was hosted by Germany from 5 to 6 March 2025 on the Isle of Vilm (document 2-6). The next informal consultation session of WG Fish is planned to be organized online on 12 November 2025.

2.2 The Session noted the successful workshop held back-to-back with IC WG FISH 5-2025 on the development of a HELCOM common understanding of ecosystem-based fisheries management (EBFM) with input from BSAC, BALTFISH, and ICES. The Session noted further work on the HELCOM common understanding through a drafting group as well as the planned interactions on the topic with the BSAC EBM workshop on 21 May 2025, with the BALTFISH forum on 25 June 2025 under the German Presidency and 8 September 2025 under the Swedish Presidency, and with ICES during the Annual Science Conference 18 September 2025. The Session further noted that IC WG FISH 6-2025 anticipates finalizing the document in autumn 2025.

2.3 The Session invited the Secretariat to share the current draft EBFM common understanding document with HOD for information and with a view to providing any comments to IC WG FISH 6-2025. The Session provided as general steer for the work that it was important to clearly express that ecosystem-based management of fisheries fishery should be addressed within the wider concept of ecosystem based marine management. Furthermore, the Session agreed that further work should align closely with concepts and developments on EBFM at ICES and welcomed the information on the ongoing dialogue and plans to organize an interaction and discussion on this topic at the ICES Annual Science Conference at a Baltic Sea event tentatively scheduled for 18 September 2025.

2.4 The Session considered the implications of the proposal to ‘pause’ the 2021 HELCOM Baltic Sea Action Plan (BSAP) Action S42 (“Update and harmonize by 2024 the 2016 BALTFIMPA decision support tool approach with ongoing initiatives e.g. in the International Council for the Exploration of

*the Sea (ICES) on a seafloor assessment framework for the Baltic Sea. This tool should also provide options on how to reduce the possible negative impact of fisheries on conservation values in the most cost-effective way, including in marine protected areas (MPAs)”) for the time being, as the outputs are being achieved through other ongoing national activities, and the Action was anticipated to be reviewed at the close of the BSAP period in 2030 to identify whether a joint regional tool would still be needed.*

2.5 The Session noted the view by Sweden that if a BSAP Action was ‘paused’, very clear documentation was needed on which alternative tools fulfil the function covered by that action. It was also underlined as important to ensure that such tools are equally accessible to all Contracting Parties. The Session invited WG Fish to compile documentation on the available tools that provide corresponding functionalities to the BALTFIMPA tool.

2.6 The Session noted the clarification by the EU that the EU Marine Action Plan remains valid and invited WG Fish to continue work on expressing how regional HELCOM work contributes to the targets, including on the suggestion under the Marine Action Plan to prohibit mobile bottom fishing in MPAs.

#### *WG Response*

2.7 The Session took note of the Memo of the Sixth Informal Consultation session of the HELCOM Response Working Group (IC WG RESPONSE 6-2025), which was hosted by Lithuania from 1 to 4 April 2024 in Klaipeda, Lithuania (document 2-5). The next informal consultation session of WG Response is planned to be organized from 3 to 6 November 2025 in Riga, Latvia.

2.8 The Session took note of the fact that the first day of IC WG RESPONSE 6-2025 was a thematic day focusing on long-term risk analysis and specifically on the [BRISK II](#) project (Long-term risk analysis for oil and hazardous and noxious substances (HNS) pollution from shipping accidents to the marine environment in the Baltic Sea, January 2025-December 2026). The Session took note of the fact that IC WG RESPONSE 7-2025 will also include one extra day dedicated to the BRISK II project.

2.9 The Session took note of the fact that the [report on wildlife response activities and preparedness in 2023-2024](#), as compiled by EG Wildlife, was approved for publication via correspondence in May 2025 by the WG Response following IC WG RESPONSE 6-2025.

2.10 The Session took note of the fact that IC WG RESPONSE 6-2025 had recommended holding the first session of the new HELCOM Expert Group on Places of Refuge (EG PoR) in person, and that the dates would be decided by correspondence once the relevant stakeholders had been identified. The Session encouraged Contracting Parties to nominate contacts for EG PoR by the extended deadline on 5 June 2025.

2.11 The Session took note of the fact that the HELCOM BALEX 2025 international pollution response exercise will take place from 25 to 28 August in Świnoujście, Poland.

#### *HELCOM-VASAB MSP WG*

2.12 The Session took note of the Memo of the Sixth Informal Consultation Session of the joint HELCOM-VASAB Maritime Spatial Planning Working Group (IC HELCOM-VASAB MSP WG 6-2025), which was hosted by Germany from 7 to 9 April 2025 in Rostock (document 2-17). The next informal consultation session of HELCOM-VASAB MSP WG is planned to be organized from 15 to 17 October 2025 in Helsinki, hosted by Finland, back-to-back with the Baltic Sea Region MSP Data Expert Sub-Group (BSR MSP Data ESG) and the [ReMAP](#) project workshop.

2.13 The Session noted the progress on the interim assessment of the Regional MSP Roadmap 2021-2030 implementation and the amendments to the revised version of the workplan of the related Task Force.

2.14 The Session noted the status of the process on aligning the revision of the VASAB Recommendations for spatial planning of the coastal zone and HELCOM Recommendation 24/10 R on implementation of integrated coastal management and maritime spatial planning in the Baltic Sea Area. The Session further noted that the VASAB CSPD/BSR meeting held in March 2025 recommended a common approach and possibly merging the VASAB and HELCOM Recommendations. The Session took note of the fact that the IC HELCOM-VASAB MSP WG 6-2025 supported the plan on aligning the process of revising the related HELCOM and VASAB Recommendations during 2025, aiming to submit the revised HELCOM and VASAB Recommendations to the October 2025 session of the Group for recommendation for approval and to aim for the December 2025 HELCOM HOD for the HELCOM Recommendation and VASAB CSPD/BSR for the VASAB Recommendation, or alternatively to aim to submit a joint Recommendation to HOD and CSPD/BSR.

2.15 The Session took note of the fact that the work done in the [MSP4BIO](#) and [ReMAP](#) projects was welcomed by IC HELCOM-VASAB MSP WG 6-2025, as well as the numerous outcomes of the projects that support implementation of the Regional MSP Roadmap and the workplan of the Group.

2.16 The Session took note of the fact that IC HELCOM-VASAB MSP WG 6-2025 acted as the Steering Group of the EUSBSR Policy Area Spatial Planning (PA SP) on MSP for Agenda Item 6 (Coordination of the EUSBSR Policy Area Spatial planning, MSP related projects and initiatives).

2.17 The Session took note of the fact that EN Clime and the HELCOM-VASAB MSP WG organized a joint Informal Consultation Workshop on climate change and maritime spatial planning ([IC WS CLIME MSP 1-2025](#)) online on 30 April 2025.

2.18 The Session took note of the fact that a second joint dedicated session between the HELCOM-VASAB MSP WG and WG BioDiv was held on 15 May 2025 during IC WG BIODIV 5-2025 (13-16 May 2025).

2.19 The Session took note of the fact that Penina Blankett, Finland, was elected as Co-Chair from the HELCOM side and Jan Schmidtbauer Crona, Sweden, was elected as the Vice Co-Chair from the HELCOM side.

2.20 The Session considered the status of the draft HELCOM-VASAB Guidelines for the implementation of the ecosystem-based approach in Maritime Spatial Planning (MSP) in the Baltic Sea Area (document 2-9-Rev1) and supported the minor comment by Sweden on streamlining the document, being in line with the input from IC WG GEAR 8-2025. The Session supported the proposed procedure and timeline for further drafting the revised Guidelines.

2.21 The Session took note of the view by the EU that the revision process of the Guidelines is timely and relevant, taking into account the recent MSP developments in EU and globally.

#### *WG Sea-based pressures*

2.22 The Session took note of the Memo of the Fifth Informal Consultation Session of the HELCOM Reduction of Pressures from Sea-based Sources Working Group (IC WG SEA-BASED PRESSURES 5-2025), which was hosted online by Finland from 23 to 25 April 2025 (document 2-1). The next informal consultation session of the WG on Sea-based pressures is planned to be organized as an in-person session from 30 September to 2 October 2025, back-to-back with IC RAP Noise 3-2025 on 29 September 2025.

2.23 The Session invited Contracting Parties to consider hosting IC RAP Noise 3-2025 and IC WG SEA-BASED PRESSURES 6-2025 as an in-person session from 30 September to 2 October 2025, back-to-back with IC RAP Noise 3-2025 on 29 September 2025.

2.24 The Session took note of the fact that Germany will be able to host IC RAP ML 5-2026, to be held on 20 April 2026, back-to-back with IC WG SEA-BASED PRESSURES 7-2026 from 21 to 23 April 2026, as in-person sessions, tentatively in Hamburg.

2.25 The Session took note of the fact that Frank Jensen, Denmark, was elected as Chair of WG Sea-based pressures for the remainder of 2025 and for the period 2026-2028, and that Lars Åkesson, Sweden, was elected as Vice-Chair of WG Sea-based pressures for the period 2026-2028.

2.26 The Session took note of the fact that the Baltic Sea Environmental Fact Sheet (BSEFS) for *Depositing of Dredged Material in the Baltic Sea for the period 2013-2023* was approved via correspondence by WG Sea-based pressures on 2 June 2025, following IC WG SEA-BASED PRESSURES 5-2025. In this regard, the Session noted the concern raised by CCB on a significant increase in capital dredging activities, raising concerns about impacts on the seafloor and sediment resuspension.

2.27 The Session took note of the fact that the revised Terms of Reference (ToR) and a draft workplan for EG DreDS for 2025-2027 were approved via correspondence by WG Sea-based pressures on 2 June 2025, following IC WG SEA-BASED PRESSURES 5-2025.

2.28 The Session took note of the fact that IC WG SEA-BASED PRESSURES 5-2025 recommended the removal of three BSEFS on non-indigenous species (NIS) from the HELCOM website.

2.29 The Session took note of the fact that the revised HELCOM Submerged Assessment - Warfare Materials in the Baltic Sea (volume 1) and the HELCOM Submerged Assessment - Wrecks in the Baltic Sea (Volume 2) were approved via correspondence by WG Sea-based pressures on 2 June 2025, following IC WG SEA-BASED PRESSURES 5-2025.

2.30 The Session recommended approval of the draft policy brief on monitoring marine microlitter in mussels (document 2-2) through the correspondence procedure.

#### *WG Source to sea*

2.31 The Session took note of the Memo of the Fifth Informal Consultation Session of the Source to Sea Working Group (IC WG SOURCE TO SEA 5-2025), which was hosted online by Estonia from 6 to 9 May 2025 (document 2-15). The next informal consultation session of WG Source to sea is planned to be organized from 21 to 24 October tentatively in Uppsala, Sweden, back-to-back with a workshop considering nutrient recycling policy outputs organized by the [CiNURGi](#) project and EUSBSR PA Nutri on 20 October 2025.

2.32 The Session took note of the fact that the Informal Consultation Workshop on the Source-to-Sea Approach was hosted online by Estonia back-to-back with IC WG SOURCE TO SEA 5-2025 on 5 May 2025. IC WG SOURCE TO SEA 5-2025 invited a planning group consisting of the Chairs, Estonia, Germany and the Secretariat to prepare further analysis and proposals based on the shared country experiences, to find out what could be solved on the HELCOM level and to share the results with the relevant Expert Groups.

2.33 The Session took note of the information on the [HELCOM Stakeholder Conference 2025](#) on hazardous substances which was held online on 31 March 2025.

2.34 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 supported the ongoing work for drafting the Regional Action Plan on Hazardous Substances (RAP HAZ), which is coordinated in EG Haz.

2.35 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 considered the draft for the updated HELCOM Recommendation 25/2 and acknowledged that earlier proposals from EG Haz and WG Source to sea have been taken into account in the scope and content of the draft Recommendation and that it includes all the relevant sections.

2.36 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 proposed that a drafting group be formed to finalize the drafting process of the regional report on pharmaceuticals (supporting BSAP Actions HL22-23) by IC WG SOURCE TO SEA 6-2025.

2.37 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 invited the HAZGONE project platform to make initial proposals for IC WG SOURCE TO SEA 6-2025 on how to proceed with strengthening the HELCOM Recommendation 28E/5 and recommended considering establishment of a drafting group after that.

2.38 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 proposed bringing the issue of securing the funding of the optional parts of the PLC-9 project to the HOD and recalled that the needed finances were included in the original PLC-9 project proposal.

2.39 The Session took note of the fact that information has been gathered with the help of a questionnaire on the status of implementing the Baltic Sea Regional Nutrient Recycling Strategy. IC WG SOURCE TO SEA 5-2025 acknowledged that countries could have different approaches to implementing the strategy with one policy or with multiple actions and policies. The CINURGi project was invited to further analyze the results in preparation of the workshop in autumn 2025 and provide recommendations on how the implementation of the strategy could be enhanced.

2.40 The Session took note of the fact that IC WG SOURCE TO SEA 5-2025 discussed organizing the work on agricultural matters in the work of the Group, and recommended organizing dedicated sessions for hazardous substances, agriculture and eutrophication also in the future, but to aim for scheduling them so as to facilitate attendance for several days and collaboration between experts and fields of work, acknowledging that there are usually at least two ministries involved in the WG Source to sea work.

2.41 The Session considered the draft HELCOM Guidelines on best practices to improve soil structure and aggregate stability on clay soils (document 2-8) and supported the minor comment by Germany proposing to delete the sentence “Lightly tilled soils may have smaller water storage capacity than ploughed soil, which can lead to increased erosion and phosphorus losses during heavy rains or snowmelts” under chapter 3.1.4 No-till or reduced tillage, since this statement contradicts the common finding that conservation tilled soils have a higher water infiltration rate than ploughed soils and shows less erosion.

2.42 The Session took note of the other minor comment by Germany on excluding (heavily contaminated) industrial by-products from being spread on agricultural land and further took note of the clarification by the Secretariat that it has been taken into account already in the text under chapter 4.1.3 Suitability of the measure (gypsum) with mentioning “If by-products of industry are used it is important to make sure that they do not contain harmful substances”.

2.43 The Session recommended approval of the draft HELCOM Guidelines on best practices to improve soil structure and aggregate stability on clay soils through correspondence procedure (document 2-8).

2.44 The Session recalled that IC HOD 6-2024 in principle approved the draft new criteria for designating and deleting hot spots. The Session took note of the status of testing the draft new criteria for designating and deleting hot spots (document 2-16).

#### *WG BioDiv*

2.45 The Session took note of the Memo of the Fifth Informal Consultation Session of the Biodiversity, Protection and Restoration Working Group (IC WG BIODIV 5-2025), which was hosted by Estonia from 13 to 16 May 2025 (document 2-10-Rev1). The next informal consultation session of WG BioDiv is planned to be organized online from 7 to 9 October 2025, hosted by Estonia. The following informal consultation session is planned to be organized as an in-person session hosted by Germany on 19 to 22 May 2026.

2.46 The Session noted that Sweden thanked all Contracting Parties for their engagement and in-depth discussions on the potential need for a revision of HELCOM Recommendation 27-28/2

Conservation of seals in the Baltic Sea Area based on the positions expressed and the related discussion and that Sweden regretted that it had not been possible to agree on a revision of the Recommendation 27-28/2 and requested that a discussion on any new tasks or alternative ways forward would be postponed.

2.47 The Session postponed the discussion regarding Recommendation 27-28/2 Conservation of seals in the Baltic Sea Area and possible alternative ways forward as expressed in document 2-10-Rev1 Annex 2 until IC HOD 8-2025, recognizing that if there was agreement to take the tasks forward an adjustment of the proposed timeline would be needed to take into account the 6-month delay.

2.48 The Session mandated a revision of HELCOM Recommendation 37/2 'Conservation of Baltic Sea Species categorized as threatened according to the 2013 HELCOM Red List' and HELCOM Recommendation 40/1 'Conservation and protection of marine and coastal biotopes, habitats and biotope complexes categorized as threatened according to the HELCOM Red List' for the limited sections needed to reflect the most recent Red List assessment and future-proof the Recommendations. The Session invited the Secretariat to prepare a first draft to IC WG BIODIV 6-2025 with an anticipation of presenting the revised Recommendations for adoption to IC HOD 8-2025.

2.49 The Session noted the slight delay in completing the description of the role of HELCOM in supporting the work of Contracting Parties to implement the EU NRR due to the large number of constructive suggestions provided by Working Groups. The document would communicate HELCOM work internally, and also towards an external audience, such as for example national colleagues leading work on preparation of national restoration plans. The description of the role of HELCOM captures the broad body of work, placing an emphasis on topics such as the source to sea approach and passive restoration.

2.50 The Session supported the proposal to develop the HELCOM Regional Action Plan for benthic habitat restoration for adoption at the Ministerial Meeting in 2026, noting that a final draft would be available in early autumn 2025, which would enable Contracting Parties to refer to the information if they would so choose in their EU NRR national restoration plans.

2.51 The Session noted the ongoing issue of nominating a Vice-Chair for WG BioDiv.

2.52 The Session recommended approval of the Terms of Reference and workplan for the HELCOM Expert Group on Phytoplankton (EG Phyto) (document 2-11) through correspondence procedure.

2.53 The Session considered the proposal of establishing a HELCOM Expert Group on Pelagic Habitats (EG Pelagic), noting that the main duties of the Group would include preparing integrated assessments of pelagic habitats. The Session noted the following views:

- a) Latvia was not opposed to expert level cooperation and recognized the need for the expert group to improve regional holistic assessments of pelagic habitats, however underlined that as there are currently resource restrictions which also have implications for the Secretariat's capacity to support work it was important to carefully consider whether EG Pelagic was needed;
- b) Germany was not opposed to establishing EG Pelagic and noted that national discussions also included considerations on whether all pelagic assessment issues could be addressed in one group. Germany underlined that the main duty and priority of work of EG Pelagic would be delivering assessments relevant for HOLAS 4 and EU MSFD reporting requirements, thereby work on picoplankton and viruses should be considered as a research issue to only be addressed if resources allow and would currently not be prioritised.

2.54 The Session established the HELCOM Expert Group on Pelagic Habitats (EG Pelagic) and recommended approval of the Terms of Reference (document 2-12) through correspondence procedure. The Session invited the Secretariat to schedule the first session of the Group, where a Chair would be elected and invited Contracting Parties to nominate experts.

2.55 The Session recommended reviewing the working arrangements and structures of EG Pelagic, EG Phyto and EG Zoo after the completion of HOLAS 4 through WG BioDiv, with a view to ensuring high quality delivery of duties and outputs in the most efficient and practicable manner.

2.56 The Session recommended approval for publication of the Red List II final report on species (as contained in document 2-13) in the Baltic Sea Environment Proceedings (BSEP) series. The Secretariat clarified that comments made during IC WG BIODIV 5-2025 have been incorporated as well as possible in the available timeline for preparing documents for publication.

2.57 The Session recommended approval for publication of the Red List II final report on biotopes, habitats and biotope complexes (as contained in document 2-14) in the Baltic Sea Environment Proceedings (BSEP) series.

#### *WG GEAR*

2.58 The Session took note of the Memo of the Fifth Informal Consultation Session of the GEAR Working Group (IC WG GEAR 5-2025), which was hosted online by Poland from 20 to 22 May 2025 (document 2-18). The next informal consultation session of WG GEAR is planned to be organized from 18 to 20 November 2025, hosted by Poland in Warsaw. The following session is planned to be organized online 26 to 28 May 2026, and the one following that from 17 to 19 November 2026 as an in-person session for which Contracting Parties have been invited to offer to host.

2.59 The Session supported the development of a HELCOM glossary for selected key terminology to be overseen by WG GEAR and maintained on the helcom.fi website as a concise and living document.

2.60 The Session noted discussions on anchoring the ICES/HELCOM Working Group Integrated Assessment of the Baltic Sea more firmly to HELCOM activities through WG BioDiv, but with potential links to other HELCOM Subsidiary Bodies such as WG GEAR and HELCOM-VASAB MSP WG. The Session noted the importance of clarifying how products would be delivered and the mandate HELCOM would always retain in matters related to MSFD regional coordination and modifying assessment outputs for example for HOLAS purposes.

2.61 The Session considered the proposal to re-evaluate the ambition level for BSAP Actions to identify if work in other fora due to which some of the actions that have not been fully implemented are no longer relevant. The Session took note of the view that it was not within the mandate of a Working Group to change the ambition level of a BSAP action that had been agreed at the Ministerial level. The Session also noted that especially where the implementation barrier is a lack of resources, HOD should consider possible funding priorities in each case and that this could include deciding to wait with implementation work until funding became available, or for HELCOM Contracting Parties to come together to fund an action through a project or targeted funding from national resources. The Session supported not doing parallel work if the BSAP Action had been achieved through work in other fora, and that for this to be a justification for pausing implementation work clear documentation of the alternative outputs would be a requirement.

2.62 The Session instructed Working Groups to provide case-by-case documentation of any BSAP Action for which they would consider pausing implementation, adjusting the ambition level or considering work of another organization as sufficient to meet the objectives, in order for HOD to evaluate and decide on the matter in every case.

2.63 The Session supported the proposal that HOLAS 4 thematic assessments be split up according to topic area and that economic-social analyses and spatial impact and pressure assessments be integrated in the topic-specific thematics. The Session supported the proposal for the HOLAS 4 summary report to focus on BSAP and global targets and objectives with a view to creating a narrative around selected policy priority topics using the underlying thematic- and indicator assessment information to communicate to a global audience, and to decouple the structure from EU MSFD. The Session invited the Secretariat to improve clarity and the amount of detail provided on the working

procedures and structural details of HOLAS 4 products before submitting communications to other subsidiary bodies.

2.64 The Session noted an update on the ongoing work in WG GEAR to finalize drafting of the updated HELCOM Monitoring and Assessment Strategy in early autumn and the finalization of a first round of updates of HELCOM Monitoring Programmes to be submitted for technical review to Working Groups and Expert Groups in autumn.

2.65 The Session noted the postponement of developing a common approach to ocean acidification, and the view to complete the document by the end of 2025.

2.66 The Session supported registering BSAP as a contribution in the UNFCCC portal as an overarching voluntary contribution, as per the commitment in the BSAP preambular text, and invited the Secretariat to take the required steps to implement the registration. The Session noted that reporting the BSAP to the UNFCCC portal was an opportunity to consider how HELCOM actions and measures contribute to climate change mitigation action, and an opportunity to express how our actions contribute to blue carbon or improving resilience of ecosystems.

2.67 The Session noted the challenges with finding an appropriate approach to progressing work on subsidies and incentives (BSAP HT21, HT22) and the anticipation of a delay beyond the BSAP timeline in fully delivering the work. The Session supported the work in HELCOM to continue addressing HT21 and HT22 as very powerful actions, however to currently adjust the effort to the limited available resources and continue to seek opportunities for resourcing work in the future.

2.68 The Session supported providing the overview of how regional HELCOM work contributes concretely to global CBD GBF targets to the national focal points responsible for reporting to the CBD. The Session further supported the proposal to collect feedback from the currently commencing CBD GBF reporting round and feedback on how regional information was perceived and used as a basis for future work on tailoring regional information and also for reviewing whether any topic areas from the CBD GBF that is currently not covered by the BSAP would be relevant to bring into HELCOM work.

2.69 The Session considered the call to HOD by the Joint Session between WG GEAR and Chairs to ensure that all national delegates are committed to adhering to the Rules of Procedure and are committed to adopting the memo at the end of the meeting.

2.70 The Session considered the call to HOD by the Joint Session between WG GEAR and Chairs to ensure Leads of Delegation are nominated to all Working Groups and to ensure that there is a person with a mandate to act as Lead of Delegation in every Working Group session.

2.71 In conclusion, the Session emphasized the importance of Working Group Leads of Delegation (Group Leads) being nominated, and invited HOD to review the current nominations, which can be viewed under [Groups](#) in the HELCOM Meeting Portal, and to complete the Leads of Delegation nominations for all Working Groups as soon as possible by informing the Secretariat.

2.72 The Session invited Working Groups to trial new ways of working, for example by scheduling Group Lead sessions before commencement of plenary to clarify procedural issues or to resolve any difficult issue as it arises.

2.73 The Session noted that Working Group Chairs have considered attending HOD sessions in December in person with a view to gaining better insights into HOD discussions, taking a role in the introduction of issues from their respective Groups, and to use the opportunity to coordinate on topics of joint interest.

2.74 The Session considered draft internal guidance on improving the drafting of HELCOM Recommendations and implementation reporting (document 2-19). The Session noted the following views;

- a) several Contracting Parties expressed support for the guidance to ensure Recommendations are comparable in format and content;
- b) Sweden supported the proposal to invite Working Groups to regularly review the relevance and up-to date nature of Recommendations and supported the proposed additions to the helcom.fi webpage and the HELCOM Explorer, on the condition that the Secretariat considers those changes feasible within the time frame envisioned. A 2-week study reservation was placed for a final review of the text before approval;
- c) Germany had observed when drafting criteria for hot spot identification that many HELCOM Recommendations are vague and not quantitative enough as a basis for deriving criteria, and future work in HELCOM and any updates to the guidance should therefore strive to make Recommendations clearer and more quantitative;
- d) Finland welcomed the guidance which had been first called for some 20 years ago. When the guidance would be used in coming years this could lead to identification of adjustments to be made to the guidance;
- e) the EU queried how the guidance could be made clearer regarding how Recommendation implementation reporting could be linked to reporting under the EU MSFD, with the aim of avoiding duplication of effort. The Secretariat suggested that further work could explore if there was a link to be made in particular to the reporting related to the Programme of Measures, as this was currently not clear.

2.75 The Session recommended approval for use of the internal guidance on improving HELCOM Recommendation drafting and implementation reporting, with a 2-week study reservation by Sweden to be addressed through the correspondence procedure.

2.76 The Session invited WG GEAR and the Secretariat to work further on text proposals for the section on assessment of effectiveness and explore whether a link could be made from HELCOM Recommendation implementation reporting to EU MSFD reporting, for example related to Programme of Measures (Art 13, 14).

2.77 The Session recommended carrying out regular reviews by Working Groups of existing Recommendations to ensure the HELCOM *acquis* remains up-to date and valid and invited Working Groups to consider scheduling such a review at the beginning of their next workplan updates i.e. in 2027.

2.78 The Session mandated the Secretariat to begin including information on lead country, reporting deadline and keywords for Recommendations on the helcom.fi website to improve useability by Contracting Parties, and furthermore to begin including information from implementation reporting in the HELCOM Explorer aiming for information that would enable simple statistics to be presented.

2.79 The Session recommended the Guidance for reporting of national BSAP actions (document 2-21) and the reporting template including additional action specific guidance (Attachment 1) for use in the reporting process to be completed by 31 October 2025. The Session supported the WG GEAR Lead of Delegation acting as the national focal point for reporting unless a separate person was nominated to the Secretariat by **15 June 2025** and further that the HOD would act as national focal point in case no WG GEAR Lead of Delegation had been nominated or any other person was nominated.

2.80 The Session noted that the Secretariat would need to allocate technical resources to update the HELCOM Explorer to enable the tool to be useable as foreseen in the BSAP for presenting information on progress of implementation.

2.81 The Session recommended approval and publication as a HELCOM publication of the Guidance for incorporating climate change considerations in the review and update processes of HELCOM policies (document 2-20) through correspondence procedure.

2.82 The Session noted that any new or updated HELCOM policy being brought forward to HOD/HELCOM for adoption was proposed to include a confirmation that it had undergone 'climate-proofing' according to the guidelines and further noted that the guidelines were scheduled for a review three years after their adoption i.e. by 2028.

*Other*

2.83 The Session considered the draft call for tender for the HELCOM-commissioned external legal review of carbon capture and storage (CCS) in the Baltic Sea (document 2-7). The Session reviewed the draft call for tender, suggested revisions, as contained in the document 2-7-Rev1, and recommended it for publication on 2 September 2025.

2.84 The Session took note of the views by Finland and CCB that the legal review and environmental analysis should be carried out in parallel. Finland and CCB emphasized that, while the legal analysis may be completed first, no further actions should be taken solely on this basis before completion of the environmental analysis.

2.85 The Session considered and approved the timeline for the tendering process.

2.86 The Session took note of the fact that the Heads of Delegation will discuss the selection of consultants based on those evaluated and shortlisted by the Secretariat in accordance with the established criteria. Following this discussion, a primary and a secondary reviewer will be chosen to carry out the planned reviews.

2.87 The Session recommended holding the HOD meeting to discuss and decide on the selection of the consultant on **25 November 2025 at 9:00 CET / 10:00 EET**.

2.88 The Session recalled that IC HELCOM 3-2025 invited Sweden, Germany, and CCB to prepare draft Terms of Reference (ToR) for the environmental analysis of CCS in the Baltic Sea.

2.89 The Session considered the draft ToR for the environmental analysis (document 2-3-Rev1) and took note of the following views from the Contracting Parties:

- a) Under the EU CCS Directive (2009/31/EC), CO<sub>2</sub> storage is only permitted if a site-specific assessment demonstrates no significant risk of leakage or harm to the environment or human health.
- b) The scope of the analysis requires clarification, particularly in stating that it does not cover potential positive environmental impacts from reduced CO<sub>2</sub> in the atmosphere.
- c) The requirement to demonstrate environmental benefits from the projects, specifically the amount of CO<sub>2</sub> captured, appears contradictory with the overall objective of the environmental analysis.
- d) This work should be treated as an initial step, which may be further complemented as additional knowledge becomes available. A more detailed environmental analysis could be conducted at a later stage, taking into account updated information on the specific sensitivity of the Baltic Sea, including existing pressures, and status as described in HOLAS 3.
- e) The EU noted that there are already a lot of relevant material available on CCS (Impact Assessment to the EU CCS Directive and studies), and this should be used to support and conduct the environmental analysis.
- f) The workload the analysis requires is high, and the level of expertise required to conduct the work may not be readily available at the national level.

2.90 The Session considered the further guidance document for conducting the environmental analysis of CCS in the Baltic Sea (document 2-4).

2.91 The Session suggested merging documents 2-3-Rev1 and 2-4, with document 2-4 to be included as an attachment to 2-3-Rev1. The attachment should be revised to eliminate redundancies and content already addressed in document 2-3-Rev1. It should clearly state that the listed work items are optional, subject to feasibility, and may exceed available capacity or expertise. The Session further suggested that the attachment should focus on the environmental analysis, removing references to technical feasibility, instead describing available technological solutions at a general level. The Session noted that CO<sub>2</sub> leakage is closely linked to geological conditions and that the environmental analysis will need to address this issue to some extent. The Session recommended approval of the draft ToR and guidance for conducting the analysis of environmental and cumulative impacts and risks of CCS in the Baltic Sea context (document 2-22).

2.92 The Session invited HOD to nominate contacts to the informal correspondence group working on the analysis of environmental and cumulative impacts and risks of CCS in the Baltic Sea context. The Session supported making the nominations by **27 June 2025** to the Secretariat (marta.ruiz@helcom.fi; katarina.viik@helcom.fi) to enable work to commence in August 2025.

2.93 The Session recalled that IC HOD 3-2023 recommended conditional approval of the project proposal on quantifying regional nitrogen depositions from ammonia-fuelled ships, subject to available resources. The final proposal, focused on evaluating whether the shipping sector will meet nutrient reduction requirements in the Baltic Sea region, was recommended for approval by IC HOD 4-2023, and Contracting Parties were invited to consider national contributions to support its implementation. The Session took note of the fact that no financing contributions have been received and considered ways to advance the matter.

2.94 The Session invited Contracting Parties to reconsider providing national contributions and invited the Secretariat to explore alternative funding options, while encouraging Contracting Parties to consider leading the search for suitable sources. The Session further noted that the project's estimated budget is outdated and may need adjustment for inflation. The Session invited Contracting Parties to consider increasing the estimated budget and to revisit all possible options at IC HOD 8-2025.

### **Agenda Item 3      Next Ministerial Meeting**

3.1 The Session recalled that HOD 61-2021 agreed on the preliminary timing of future Ministerial Meetings and alignment of relevant processes, as follows:

- a) Second half of 2026, under the Chairmanship of Poland, reporting on the implementation of the 2021 HELCOM Baltic Sea Action Plan (BSAP), considering the possible need and mandate for updating the BSAP beyond 2030; and then
- b) Second half of 2030, under the Chairmanship of Sweden, reporting on BSAP implementation, results of the HOLAS IV assessment, possible adoption of next BSAP.

3.2 The Session took note of initial plans for the 2026 Ministerial Meeting (document 3-1) and thanked Poland for offering to host the Ministerial Meeting in Warsaw.

3.3 The Session discussed the date for the Ministerial Meeting, took note of the fact that the Ministerial Meeting would take place earliest in the second half of October 2026 to ensure that the results of the first reporting on the implementation of BSAP Actions in 2025 are in place and recommended organizing the Ministerial Meeting in week 44 (27-31 October 2026) as a half-day event preceded by a intersessional HOD session to finalize any open issues.

3.4 The Session discussed the naming of the Ministerial Meeting in light of the ongoing HELCOM strategic pause. The Session recalled that in 2024 the name of the Ministerial Meeting did not refer to HELCOM but was instead called 'Ministerial Meeting on the Baltic Sea Marine Environment'. The Session took note of the fact that Finland and Sweden are in favour of returning to the term HELCOM Ministerial Meeting and agreed to revisit the issue of naming at IC HOD 8-2025.

3.5 The Session agreed to establish a drafting group to prepare a ministerial declaration or any other high-level output, as considered relevant. The Session took note of the fact that Finland, Poland and Sweden would like to be part of the drafting group. The Session invited other Contracting Parties to inform the Secretariat (rudiger.stempel@helcom.fi) by **19 June 2025** on their willingness to take part in the drafting group.

3.6 The Session supported the proposal by CCB to include nature restoration as a wider topic of the Ministerial Meeting.

3.7 The Session took note of the fact that side events can be organized by stakeholders in the margins of the Ministerial Meeting, as appropriate.

3.8 The Session noted that hosting of the 2030 Ministerial Meeting by Sweden is based on the assumption that Russia would hold the HELCOM Chairmanship from 2028-2030. Due to the current geopolitical situation, Contracting Parties may decide that Sweden will need to assume the Chairmanship already in 2028. This in turn would mean that Denmark would be hosting the 2030 Ministerial Meeting instead of Sweden. The Session agreed to return to this discussion at a later stage.

#### **Agenda Item 4 HELCOM institutional and organizational matters**

4.1 The Session considered the proposal to update the Memorandum of Understanding between HELCOM and the International Council for the Exploration of the Sea (ICES) (document 4-1). The existing MoU was signed in 1999, but it no longer fully and accurately reflects the current modes of work and cooperation between the two organizations. Initial suggestions of components that could be developed in further drafting were presented in Annex 1.

4.2 The Session noted the following;

- a) several Contracting Parties expressed support for updating the MoU between HELCOM and ICES with the aim of expressing how work would be taken forward in practice under respective and complementary mandates;
- b) HELCOM did not have a special budget that would allow issuing advice requests to ICES. Currently, in some cases where a technical service had been requested for example for HOLAS 3, Contracting Parties had made voluntary contributions to finance the requests. For HOLAS 4 it had already been identified that a technical service for spatial products expressing fishing intensity would be needed, and that these might be forthcoming through a request from the European Commission towards ICES;
- c) the EU welcomed the approach of highlighting cooperation, and noted that ICES had a strong focus on fisheries historically, and was now moving more into environmental management, and therefore it would be helpful to clearly express mandates of ICES and HELCOM and how they are complementary;
- d) Poland highlighted several sections that could be further clarified and specified when a final draft of the MoU is developed relating to both terminology and description of contributions made by Contracting Parties;
- e) Finland may raise issues around data and infrastructure security issues in the further development.

4.3 The Session concluded that updating the MoU between HELCOM and ICES was timely and appropriate and mandated the Secretariat and an ad hoc group of Sweden, Poland and Finland, and any other interested Contracting Party, to develop a final draft of the document in collaboration with ICES to be brought to HOD for approval as appropriate.

#### **Agenda Item 5 Any other business**

5.1 The Session took note of the work that has been done to engage youth and young professionals at the HELCOM Secretariat and within the PROTECT BALTIC project so far in 2025 (document 5-1).

5.2 The Session took note of the list of forthcoming informal consultation sessions and meetings in other forums (document 5-2).

5.3 The Session took note of the invitation to side events at the 2025 UN Ocean Conference that will be co-organized by CCB (document 5-3).

5.4 The Session took note of the fact that the EU has decided to schedule another “Our Baltic” conference on 30 September 2025 in Stockholm, Sweden, organized by DG MARE with DG ENV associated. The Session further took note of the fact that the aim of the event is to take stock of the implementation of the Our Baltic declaration 2023 (and its synergies with HELCOM work and the implementation of the BSAP) but also to consider other possible actions notably in the field of fisheries.

5.5 The Session took note of the request by Sweden to Denmark on updates concerning the bilateral intercalibration for the Water Framework Directive (WFD) for coastal water chl-*a* having possible implications to HELCOM work and regional nutrient targets.

5.6 In the absence of Denmark in the Session, the Session noted the written response from Denmark, having had an [evaluation of the Danish River Basin Management Plans \(3<sup>rd</sup> RBMP\)](#) - a so called “Second opinion”, and in this evaluation international experts have pointed out inconsistency between the new calculated Good/Moderate limits for phytoplankton (chlorophyll-*a*) in the 3<sup>rd</sup> RBMP and intercalibration decisions and good/moderate limits in neighbouring countries.

5.7 The Session further took note that Danish researchers have calculated new G/M limits based on an improved and more differentiated scientific basis and for some open water areas the G/M limits are lower than the intercalibrated values and the G/M limits in neighbouring countries. Denmark has therefore had ministerial meetings with Sweden and Germany on this topic, and initial scientific discussions on the scientific basis for setting G/M boundaries for phytoplankton between Denmark, Sweden and Germany are now started.

5.8 The Session took note of the fact that HELCOM has been awarded the 2024 Professor Kazimierz Demel Medal of the Polish National Marine Fisheries Research Institute for “for outstanding contributions in the field of protecting the resources and ecosystem of the Baltic Sea.”

5.9 The Session took note that Lena Avellan, Professional Secretary, will commence her parental leave in August 2025. Associate Professional Secretaries Petra Kääriä and Susanna Kaasinen will deal with WG BioDiv, WG Fish and WG GEAR related issues meanwhile.

5.10 The Session took note of the statement by the European Union on financing and legislation as included in **Annex 2** to this Memo.

#### **Agenda Item 6 Next meeting(s)**

6.1 The Session recalled that due to an overlap with the seventh session of the United Nations Environment Assembly (UNEA-7) (8-12 December 2025), the dates for IC HOD 8-2025 were agreed in January 2025 to be changed from 9 to 10 December 2025 to 16 to 17 December 2025.

6.2 The Session recommended that IC HOD 9-2026 be held online tentatively from 16 to 17 June 2026 and that IC HOD 10-2026 be held tentatively from 15 to 16 December 2026 in Helsinki, Finland.

**Agenda Item 7      Memo of the session**

7.1 The Session approved the draft Memo of IC HOD 7-2025.

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

## Annex 1 List of participants

\*) Head of Delegation

Representing	Name	Organization	Email
<b>Chair</b>	Vitalijus Auglys	Ministry of Environment	vitalijus.auglys@am.lt
<b>Vice-Chair</b>	Tomas Želvys	Ministry of Environment	tomas.zelvys@am.lt
<b>Denmark</b>	Emil Mejdal Petersen	Ministry of Environment and Gender Equality	emmep@mim.dk
<b>Denmark</b>	Tanja Lücking	Ministry of Environment and Gender Equality	tanjl@mim.dk
<b>Estonia</b>	Annabel Keerd *)	Ministry of Climate	annabel.keerd@kliimaministeerium.ee
<b>European Union</b>	Michel Sponar *)	European Commission	michel.sponar@ec.europa.eu
<b>European Union</b>	Laurent Markovic	European Commission	laurent.markovic@ec.europa.eu
<b>Finland</b>	Jan Ekebom *)	Ministry of the Environment	jan.ekebom@gov.fi
<b>Finland</b>	Annica Brink	Government of Åland	annica.brink@regeringen.ax
<b>Germany</b>	Meike Gierk *)	Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection	meike.gierk@bmu.de
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<b>Lithuania</b>	Vida Kučinskienė *)	Ministry of Environment	vida.kucinskiene@am.lt
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<b>Poland</b>	Tomasz Król	Ministry of Infrastructure	tomasz.krol@mi.gov.pl
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<b>Sweden</b>	Linda Rydell	Swedish Agency for Marine and Water Management (SwAM)	linda.rydell@havochvatten.se
<b>Sweden</b>	Lars Sonesten	Swedish University of Agricultural Sciences	lars.sonesten@slu.se
<b>Observer</b>	Aiga Jansone	Cruise Line International Association (CLIA)	aiga.jansone@carnivalukgroup.com
<b>Observer</b>	Mikhail Durkin	Coalition Clean Baltic (CCB)	mikhail.durkin@ccb.se
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<b>HELCOM Secretariat</b>	Laura Meski Associate Professional Secretary	HELCOM	laura.meski@helcom.fi
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## Annex 2      Statements by the European Commission

### **Statement by the European Commission Regarding Financing and the Implementation of EU Legislation**

The EU is an important financing body for potential projects being considered within the context of HELCOM. In order to avoid any interference with the independent decision-making procedures established under the various financing instruments, the EU does, as a matter of principle, not take any position as regards any project proposal intended for submission to EU financing bodies. This should not be interpreted in any way as prejudging the position of the EU when taking financing decisions.

The responsibility for implementing EU legislation is solely with the EU Member States. The role of the European Commission in accordance with EU Treaties is, *inter alia*, to assess compliance with EU legislation, for instance once a Member State has submitted its report under the Marine Strategy Framework Directive. Hence, any statement or position taken by the EU within the context of HELCOM should not be construed to give any assessment of whether the work done by HELCOM or by its contracting parties that are EU Member States is compliant with Union legislation.