# Memo of the Fourth Informal Consultation Session of Working Group on the Source to Sea Management of Nutrients and Hazardous Substances and Sustainable Agricultural Practices (IC WG SOURCE TO SEA 4-2024)

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## Introduction

0.1 The Fourth Informal Consultation Session of the Working Group on the Source to Sea Management of Nutrients and Hazardous Substances and Sustainable Agricultural Practices (IC WG SOURCE TO SEA 4-2024) was hosted by Poland online, on 22-25 October 2024.

0.2 The Session was attended by Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland and Sweden. Observers from Coalition Clean Baltic (CCB), World Wide Fund for Nature, John Nurminen Foundation and Race for the Baltic also attended the Session as well invited guests. The List of Participants is contained in **Annex 1**.

0.3 The Session was chaired by Lars Sonesten, Chair of WG Source to sea, Sweden, and Beata Jurga, Vice-Chair of WG Source to sea, Poland. Lotta Ruokanen and Susanna Kaasinen from the HELCOM Secretariat acted as secretaries of the Session.

**Agenda Item 1 Adoption of the Agenda**

1.1 The Session adopted the Agenda of the Session as contained in document 1-1.

**Agenda Item 2 Source to sea approach in the work of HELCOM and the group**

2.1 The Session took note that due to a major reorganization in the ministry Estonia could not submit an agenda of the planned Source-to-sea workshop to the Session and welcomed the information that Estonia is still interested in hosting it. The Session noted that Germany and the Secretariat can support Estonia in drafting the agenda and proposed to consider the draft agenda intersessionally in a written procedure to be able to organize the workshop in spring 2025.

2.2 The Session recalled that the initial concept of the workshop included cooperation with river basin management authorities and focus on both eutrophication and hazardous substances.

**Agenda Item 3 Matters arising from other HELCOM work**

3.1 The Session took note of information on the informal consultation sessions of HELCOM bodies and other events relevant to the work of the group (document 3-2).

*Updates on review of HELCOM Monitoring Manual and Programmes*

3.2 The Session recalled the ongoing update of the HELCOM Monitoring Manual and monitoring programmes (document 3-3) and noted information on the state of play.

3.3 The Session encouraged Contracting Parties to take a lead in the review of monitoring programmes that are lacking a lead, acknowledging that for most programmes the review is not labour intensive but only small changes and checks are needed. The Session proposed that EG RedCore could be asked to lead the review of the programmes related to nutrient inputs and pointed out that cooperation with EMEP is needed for reviewing the programmes related to atmospheric deposition.

3.4 The Session took note of the planned data call on monitoring stations and that the data call would not consider new monitoring methods such as satellite monitoring.

3.5 The Session took note that the Secretariat has found discrepancies between different monitoring station data sets from different sources and that further consideration is still needed by WG GEAR on how to carry out the data call.

*Climate proofing*

3.6 The Session considered the draft Guidance for incorporating climate change considerations in the review and update processes of HELCOM policies (document 3-1).

3.7 The Session in general supported the document and found it to be fit for purpose.

3.8 The Session took note of the view that the document lacks consideration of policy choices or trade-offs on climate change when HELCOM policy, for example to increase biodiversity or reduce nutrient inputs, could increase greenhouse gas emissions. The Session also took note of the contrary view that the aim of the document is simply to ensure that measures by HELCOM are still effective under the changing climate.

3.9 The Session took note of the view by WWF that HELCOM should look for synergies in combatting eutrophication and climate change, e.g. better nitrogen balance on agricultural lands.

3.10 The Session took note of a recent study "Baltic Sea ecosystem response to various nutrient load scenarios in present and future climates[1]" including scenarios that indicate that the BSAP would not prevent anoxia in the future but is the best choice of action according to our current knowledge.

3.11 The Session took note of the view that it is good that the document does not focus on energy efficiency and that the paragraph on ocean acidification related to nutrient management which is still in brackets is unclear.

3.12 The Session took note of the view by Poland that there are still many unknowns on the impacts of climate change on the Baltic Sea.

3.13 The Session pointed out that the draft Recommendation on BAT and BEP to reduce nutrient inputs and greenhouse gas emissions from manure (document 6-1 Rev.1 to this session) already considers reduction of greenhouse gas emissions and proposed that the draft Recommendation could still be climate-proofed with the help of the voluntary template.

3.14 The Session discussed whether examples of climate proofed policies in an Annex would be helpful and if any examples could be collected and included.

3.15 The Session took note of the detailed plan of climate adaptation in Poland which could contain examples that could be included in the annex.

3.16 The Session took note of the view by CCB that wastewater treatment is an energy intensive sector which is why it is very relevant for climate proofing, the proposal by CCB to check if climate proofing has been done as part of the recast of the EU Urban Wastewater Treatment Directive and if it could be used as an example and the view that climate proofing is important as part of the review of HELCOM Recommendation 28E/5.

**Agenda Item 4 Hot spots**

*Development of specifying criteria for the designation and deletion of new hot spots*

[1] *Saraiva, S., Markus Meier, H. E., Andersson, H., Höglund, A., Dieterich, C., Gröger, M., Hordoir, R. and Eilola, K. (2019), 'Baltic Sea ecosystem response to various nutrient load scenarios in present and future climates', Climate Dynamics 52(5), 3369--3387*

4.1 The Session thanked the drafting group and its chair for their hard work and discussed the draft new criteria for designation and deletion of hot spots (document 4-1-Rev.1 and **presentation 1**) with following views on the actual criteria (Annex 2 to document 4-1-Rev.1):

- **General considerations**: The Session expressed appreciation for the revised text;
- **1A) designation of municipal hot spots**: The Session supported the current version of steps 1-3 and took note of the clarification that the risk-based approach for hazardous substances to be considered throughout the criteria was presented in IC EG HAZ 5-2024 and it is based on the information of e.g. type of industry and inventory on their typical emissions on sites and a risk evaluation;
- **1B) deletion of municipal hot spots**: The Session supported the current version of steps 1-3 with minor adjustment to the text on hazardous substances to be applied throughout the criteria ("due to the discharge");
- **2A) designation of land-based industrial hot spots**: the Session took note of the clarification that prioritization based on expert knowledge on sub-regional level on objects or sites related to their risks by hazardous substances is considered enough so that exact data on emissions is not needed if not available and supported the current version of steps 1-3;
- **2B) deletion of land-based industrial hot spots**: The Session proposed to add (airborne) emissions besides (waterborne) discharges to hazardous substances throughout the criteria and supported the current version of steps 1-3;
- **3A) designation of agricultural hot spots**:
    - The Session took note that the views of Estonia presented as comments in the draft criteria are supported by Finland, addressing more the process and not the criteria and further took note of the clarification of the chair of the drafting group that the application of the criteria referred to in the comments depends on the national situation that is very variable between Contracting Parties and that the current version has flexibility for that;
    - The Session took note of the view of Finland on difficulties to practically apply the step 2 criteria, which are farm-based, to a catchment or sub-catchment level as not all required farm-scale data is available or data collection might be unreasonably expensive and laborious;
    - The Session took note of the view of Sweden on the scale of step 2 not being applicable for single farms but to ensure a sub-regional or sub-basin approach;
    - The Session took note of the proposal by Germany in General considerations on clarifying the hazardous substances with adding "e.g." before mentioning pesticides and also to change to "pesticides and veterinary products as well as their metabolites";
    - The Session took note of the proposal of the drafting group chair to have more emphasis on step 1 of the designation criteria for agricultural hot spots because challenges are already recognized within step 2, e.g. related to individual farm level, and to add a paragraph under step 2 on the challenges of data availability on local level;
    - The Session supported the General considerations and steps 1-3 with abovementioned revisions;
- **3B) deletion of agricultural hot spots**:

- The Session took note of the view by Poland pointing out that the mentioning of manageable units in step 1 allows for addressing very big farms, if they are a considerable source of nutrient input in a catchment;
- The Session took note of the view of Sweden that it was important not to identify any individual agricultural actor as a hot spot as these could be family-based companies even if very big ones. The Session took note of the clarification that also industrial hot spots might be single entities or companies and a proposal to define the scale when applying the criteria so that single individuals or families would not be identified;
- The Session supported the steps 1-3 with abovementioned revisions;

- **4A) designation of sea-based hot spots**: The Session proposed a similar technical correction to addressing hazardous substances as with other sectors criteria and to check if substances related to submerged munitions are included in the draft list of HELCOM priority hazardous substances, and supported the steps 1-3 with abovementioned revisions;
- **4B) deletion of sea-based hot spots**: The Session supported the current version of the Steps 1-3.

4.2 The Session took note that Lithuania's general opinion to the draft criteria will be presented at the HOD level.

4.3 The Session took note of the view of Finland that the process and document 4-2 has an effect on considering the draft criteria in document 4-1 Rev.1 Annex 2 and that the process should be discussed along with finalizing the draft criteria, and that Finland therefore has a study reservation on the final draft criteria until the process is clarified at the HOD level.

4.4 The Session took note that due to a recent major restructuring it is still unclear which ministries and agencies will be in charge of the hot spots related matters in Denmark and therefore detailed views are not possible to share at this stage.

4.5 The Session took note of the view of Poland that for the draft criteria a review via correspondence is still needed (currently the document contains too many comments and is unreadable).

4.6 The Session was of the view that in general the draft criteria are very advanced and that the aim is to finalize the process on the WG level before the IC HOD 6-2024 CMNT document deadline of 19 November 2024.

4.7 The Session recalled that there will be a dedicated HOD session related to hot spots on 5 November 2024 and that the session is expected to further discuss the answers to the June HOD questions and the further stages in the designation process.

4.8 The Session recommended to have an intersessional correspondence procedure after the dedicated HOD session for the WG Source to sea members between **11-17 November 2024** to agree on the final draft criteria to be submitted for IC HOD 6-2024 by 19 November 2024 and invited Germany and the Secretariat to circulate a clean version of the document to the Contracting Parties for this purpose.

4.9 The Session took note of the testing of the criteria in Sweden on industrial sites where it became clear that the assessment based on the knowledge on the industrial branches is the reason to propose the risk-based approach in relation to hazardous substances instead of data-driven approach when usually the data is not available or there is no data (**presentation 2**).

4.10 The Session took note of the clarification that not only toxicity but also other properties such as persistence of the typical substances within industries are taken into account in the assessment.

4.11 The Session noted that narrowing down the potentially numerous sites would be straightforward in Sweden by prioritizing the top ones subregionally, utilizing the views of the experts in the county boards that have local knowledge of the sites.

4.12 The Session took note of testing of the criteria in Germany (**presentation 3**).

4.13 The Session took note that defining the closeness to the coast was done with retention percentages for the WWTPs and that for agricultural priority areas also specific rivers with high nutrient loads were taken into account. The Session further took note of the clarification that the ecological status class was not very useful as such but a combination of MAI/NIC status of nutrient inputs in the sub-basin, as well as WFD and MSFD statuses of waterbodies were utilized in the testing.

4.14 The Session took note of the view of Finland pointing out that the test case presentations show the importance of testing of the draft criteria and that there is a huge amount of work to be done when applying the criteria.

4.15 The Session took note of the responses by the Contracting Parties to the HOD questions included in document 4-1 Rev.1 (**presentation 1**), pointing out that it would be very useful to hear from the remaining Contracting Parties on their views on the questions latest in the dedicated HOD session on 5 November 2024. The Session acknowledged that the responses mainly address stages 2 and 3 of the process and not the designation/deletion criteria as such.

4.16 The Session took note of suggestions by Germany for re-framing the approach to the designation of new hot spots (document 4-2), and a clarification that it is intended to support the consideration of the draft criteria at the WG level and that the actual consideration of the proposal would be done at the HOD level.

4.17 The Session took note of the view of Sweden that the hot spot expression should be retained, and that the process should give additional value - beyond EU regulations - to identifying particularly serious pollution sources and working jointly through HELCOM to remedy these.

4.18 The Session took note of the view by Finland that the national hot spot discussion has been extensive, in the media the hot spots are referred to as a shame list, which is raising some critical voices towards nominating new hot spots, and that sometimes the process on designation and deletion of new hot spots is mixed up with the existing hot spots defined in the 1990s.

4.19 The Session further took note of the view of Finland supporting the German proposal and proposing to use different wording for hot spots such as “special areas of action” or similar. Finland further suggested that a more area-based approach, where all possible pollution sources and sectors would be considered together in such areas, to be defined and prioritized based on catchment, administrative or other practicable boundaries on a smaller scale, using the drafted criteria for designating and deleting them for all sectors in the area. Finland also proposed that this would support applying the source-to-sea or catchment-based approach in HELCOM work e.g. with involving all sectors within the specified areas to improving the state of the sea. The Session also took note that Finland does not support a voluntary process but a joint HELCOM process having all Contracting Parties onboard though flexibility in applying the criteria would be used to full extent.

4.20 The Session took note of the clarification by Poland on responses to the HOD questions, not having proposed new criteria but referring to sensitivity of some data e.g. related to agriculture.

4.21 The Session took note of the view of WWF that reframing or renaming the process might not be helpful in pointing out the major polluting sites and that strong language might still be needed considering the bad state of the sea.

4.22 The Session took note of the clarification by Germany that the proposal in document 4-2 is not meant to be arbitrary or to leave some Contracting Parties totally out of the process but to use the defined criteria in all countries, not necessarily in all sectors depending on the resources and data availability etc. and that the decision on the scope of applying the criteria would remain in the hands of the Contracting Parties.

4.23 The Session acknowledged that the new proposals aim to facilitate achieving implementation of the 2021 BSAP action HT24, despite the apparent challenges and restrictions in different Contracting Parties.

4.24 The Session also acknowledged pros and cons of the new proposals and that the technical criteria should be separate from any political or economic considerations, as discussed many times earlier within the drafting process, and that e.g. the risk-based approach helps to overcome missing data.

4.25 The Session took note that Denmark is not having a fixed position yet but sees the HOD dedicated session as a good forum for discussing the process based on the new German and Finnish proposals.

4.26 The Session invited Finland to prepare their new proposal as a document for the HOD session and Finland and Germany to consider if the proposals could be merged to a joint proposal.

4.27 The Session invited Germany to approve all the previous track changes to the draft criteria, make the proposed updates and to clean the comments from the version to be submitted to the dedicated HOD session.

4.28 The Session proposed to take the process further to the dedicated HOD session based on the responses of the Contracting Parties to the HOD questions, as well as the German and Finnish proposals, acknowledging that this might possibly mean changing the terminology, flexibility with the process being voluntary on the coverage and to possibly use the sector-wise criteria on areas with several active sectors and checking how the area-based approach could affect the criteria.

*Updates on the progress of the deletion of HELCOM hot spots*

4.29 The Session took note of the status, objectives and plans for hot spot No 10: Agricultural runoff to the Archipelago Sea (document 4-3, **presentation 4**). The Session thanked Finland for the inspirational presentation.

4.30 The Session took note that the long-term goal is to achieve a continuing decrease of agricultural loading towards the load reduction targets of the national Marine Strategy and that the Finnish preliminary load reduction targets have been derived through modelling (VEMALA tool) what would be the reduction if all measures agreed in river basin management plans were implemented. The Session noted the intention to have future target setting derived from the good state of the sea instead of measures implemented.

4.31 The Session took note that the Archipelago Sea catchment area is divided in such a way that in the west side of the area a lot of manure is produced, and this is the area where also soil legacy phosphorus is a particular problem. The Session also took note that currently especially manure used as fertilizer is contributing to maintaining the high soil phosphorus content and phosphorus loading although the loading is slowly decreasing.

4.32 The Session took note of updates on plans to delete the remaining municipal hot spots in Poland (document 4-4).

4.33 The Session recalled the previous comments on some wastewater treatment plants not having a stable trend in phosphorus concentration and the request of including further years of monitoring.

4.34 The Session took note that related to the trend of nutrient concentrations of discharged wastewater concentrations meet the requirements of water permits, and the observed fluctuations between individual years are within these limits. These permits are compliant with EU standards, which are less restrictive than the requirements of HELCOM Recommendation 28E/5. Hence, wastewater treatment plants are not obliged to maintain these concentrations, even despite the technical possibilities observed in the trend. However, treatment plants that do not meet the concentration requirement below 0.5 mg/l meet the percentage reduction requirements.

4.35 The Session invited Contracting Parties to submit comments to document 4-4 by **11 November 2024** to Poland (damian.bojanowski@wody.gov.pl) and Poland to take the comments into account and submit the updated document to the Secretariat (lotta.ruokanen@helcom.fi) by **19 November 2024** for submission to IC HOD 6-2024 with the aim of deleting the hot spots.

## Agenda Item 5 Hazardous substances

*Report on the activities of EG Haz*

5.1 The Session took note of the report on the activities of Expert Group on Hazardous Substances (document 5-2).

5.2 The Session recommended for approval by correspondence the draft revised Terms of Reference for EG Haz.

5.3 The Session took note that the workplan and sub-team structure of the group will be revised in spring 2025.

5.4 The Session took note of the recommendations from the Informal Consultation Workshop on improving input estimates of hazardous substances and recalled that in the PLC-9 project there is yet no funding for the assessment of inputs of hazardous substances.

5.5 The Session took note of the clarification that it is planned to invite participants from both EG Haz and PLC-9 to take part in the new sub-team on inputs and source apportionment.

5.6 The Session took note of the election of new co-chairs for EG Haz, Berit Brockmeyer, Germany, and Johan Näslund, Sweden, and thanked Anita Künitzer, stepping down as co-chair, for her valuable work for HELCOM and excellent co-chairing of EG Haz.

*Development of the HELCOM strategic approach on hazardous substances*

5.7 The Session considered the finalized regional strategic approach (document 5-4).

5.8 The Session took note of the proposal by Germany to change the term “priority hazardous substances” to “focus hazardous substances” or “key hazardous substances” in document 5-5 as the term “priority hazardous substances” is used in the Water Framework Directive. The Session further took note of the clarification by Germany that the term “priority substances” could be used in document 5-4.

5.9 The Session recalled that the term “priority hazardous substances” has been used already in the BSAP and in HELCOM Recommendation 31E/1 since 2010.

5.10 The Session took note of the proposal by Poland to group the substances in a similar way as in WFD but acknowledged that this could cause even further confusion between WFD and HELCOM lists.

5.11 The Session recommended the regional strategic approach for adoption with the change of the term “priority hazardous substances” to “priority substances”.

5.12 The Session considered the HELCOM Recommendation on lists of priority hazardous substances, sources of release and uncertainties to address (document 5-5, **presentation 5**).

5.13 The Session took note of the view by Sweden that the success and usability of the list requires still better transparency and that the list should be further worked in EG Haz or its sub-teams to increase transparency and ensure synergies with OSPAR.

5.14 The Session noted the attachment to document 5-5 including additional information on the substances and that the Secretariat has cooperated over the process with OSPAR and NORMAN to create synergies.

5.15 The Session recalled that EG Haz has proposed to create additional material on the priority substances, synthesizing the information already collected to half-pagers to be published on the HELCOM website and pointed out that this material would be very useful for management and increased transparency.

5.16 The Session took note of the view by Germany that it would be good to further clarify which substances in the substance groups listed as priority are the priority substances.

5.17 The Session acknowledged that it is often more effective to address a whole group of substances with measures and proposed to give more examples of the substances in groups.

5.18 The Session proposed to state in the table which substances are legacy substances.

5.19 The Session took note that hexachlorobenzene is not used anymore as a pesticide but it might be emitted from some industries and proposed to clarify this in the table.

5.20 The Session took note of the view of Poland that more information is needed on how the list impacts monitoring needs or substances to be assessed in HOLAS 4.

5.21 The Session clarified that the Recommendation does not indicate that all priority substances should be included in monitoring programmes but these are substances that could pose the highest risk for the Baltic Sea and are to be the focus of HELCOM work. The Session further clarified that there is a column also for the priority substances indicating uncertainties to be transparent as there are always uncertainties remaining.

5.22 The Session invited the Contracting Parties to submit comments on the draft Recommendation to the Secretariat (Vasileios.kouloumpos@helcom.fi) by **13 November 2024** and the sub-team on priority substances and substances of emerging concern and screening to further work on the document to increase transparency and consider the terminology (c.f. paragraph 5.8) taking into account the additional comments from the commenting round.

5.23 The Session recommended EG Haz to have their next session at the end of January 2025 and finalize the document followed by WG Source to sea correspondence procedure prior to submitting the document for adoption in IC HELCOM 2-2025.

5.24 The Session discussed the draft Regional Action Plan on Hazardous Substances (document 5-6, **presentation 5**).

5.25 The Session took note that WG Maritime supported the work and suggested cooperation in drafting a measure prohibiting open-loop scrubbers as well as adding more additional information on the actions.

5.26 The Session supported the establishment of the drafting group for further development of the draft action plan based on comments from relevant working groups.

5.27 The Session took note of the view by Sweden that the draft action plan needs further clarity and clearer structure and the actions should bring added value beyond existing framework.

5.28 The Session took note of the view by Germany that the proposal should not be to prohibit open-loop scrubbers but the discharge. The Session also took note that WG Maritime has established a correspondence group regarding scrubbers and proposed to cooperate with WG Maritime in drafting the action.

5.29 The Session took note of the view by Finland supporting the views by Sweden and Germany on further work needed on the action plan.

5.30 The Session took note that the first drafting group session will be held on 11 November 2024 and invited Contracting Parties that have yet not nominated contacts to the drafting group to send their nominations to the Secretariat (susanna.kaasinen@helcom.fi).

5.31 The Session invited the Secretariat to draft possible substance specific actions for the action plan and present them to the drafting group.

5.32 The Session proposed to postpone the adoption of the action plan until 2026 noting that the HOD will be informed of the progress of work in December.

*Review of HELCOM Recommendations related to industry and hazardous substances*

5.33 The Session considered the questions from the project to support the implementation of BSAP HL4 on updating HELCOM Recommendations for hazardous substances in industry (document 5-1, **presentation 6**).

5.34 The Session supported the proposal by EG Haz to create an umbrella Recommendation which would cover all relevant IED sectors and that further Recommendations on industries which are relevant for Baltic Sea should supplement the BREFS and should be referred to in the umbrella Recommendation.

5.35 The Session took note of the view by Sweden that the new umbrella Recommendation should recommend using the lowest possible BAT associated emission levels if it is shown that they are relevant and risk entering the Baltic Sea. The Session also took note that Sweden supports Recommendations complimenting current legislation and providing equal opportunities for the industry.

5.36 The Session took note of the view by Germany that the HELCOM Recommendation could address small and medium sized enterprises that are outside of the scope of the EU BREFs and extend the BREF requirements to these enterprises where appropriate. The Session also took note of the proposal by Germany to connect the work of drafting of the action plan on hazardous substances with the extended timeline with drafting the new Recommendations. The Session further took note of the view by Germany to highlight in the HELCOM Recommendation HELCOM priority substances as well as WFD substances and better connect monitoring results as a feedback loop to the industrial recommendations.

5.37 The Session took note of the view by Lithuania supporting the proposal to update only the umbrella Recommendation and that as proposed the new Recommendation should include list of techniques, list of substances, requirements for monitoring and guidance for chemical inventory.

5.38 The Session recommended informing HOD of the plan on the update of only the umbrella Recommendation.

*HOLAS 4 development related to hazardous substances*

5.39 The Session considered and supported the prioritisation of issues within the HOLAS RevDev workplan for hazardous substances (document 5-8).

5.40 The Session noted that resources have not yet been secured for implementing the HOLAS RevDev workplans and invited the Contracting Parties to consider assigning resources for the work.

5.41 The Session noted the questions related to the use of HELCOM integrated assessments, with a particular focus on biodiversity (document 5-11) and discussed development needs for the CHASE integrated assessment tool.

5.42 The Session took note that Sweden uses indicator results for the MSFD national assessment and thematic assessment results are used for communication purposes. The Session noted the view by Sweden that integrated assessment would be relevant also in the future but the development work of CHASE should have a lower priority focusing on integrating possible new indicators.

5.43 The Session took note that Germany has not used the integrated assessment in the MSFD national assessment and has used one-out-all-out principle for indicators in the national assessment but has displayed the map showing the HELCOM integrated assessment in the national MSFD report. The Session noted that there is still a problem with data quality which is reflected in the integrated assessment results and the proposal for EG Haz to have a closer look at the issue. The Session further noted the view by Germany that HELCOM is not currently using the integrated assessment results but could make better use of them e.g. in hot spots designation. The Session also took note that CHASE enables to combine biological effects results with concentration assessments and noted the value in maintaining such integrated assessments at suitable scales.

5.44 The Session took note that Poland has used indicators in the MSFD national assessment, not the integrated assessment, focusing on number of substances (grouped as PBT and non-PBT) that achieve or do not achieve GES, in line with current EU guidance. The Session also took note of discrepancies with Polish national and HELCOM assessment areas.

5.45 The Session took note of a document on assessment units submitted to IC WG GEAR 7-2024 and proposed that, where needed, any discrepancies between national and HELCOM assessment areas should be resolved prior to HOLAS 4.

5.46 The Session took note of update on HARSAT progress and long-term practical organization (document 5-10).

5.47 The Session considered the proposal to formalize the HARSAT User Group (HUG) as an annual process that can be linked to (e.g., incorporated in or back-to-back with) existing relevant group meetings of the three organizations (HELCOM, OSPAR, or AMAP) and recommended for approval the request to formalize this joint user group.

5.48 The Session took note of the proposal by Germany that it would be good if HELCOM, similarly to OSPAR, could implement a yearly run of the HARSAT tool, for example to check underlying data and that a future work priority should be the 'regional assessment' component (the assessment unit level evaluation).

5.49 The Session took note of the view by Poland that the HARSAT tool has been complex to use and noted the clarification that HARSAT user group provides opportunities for learning the use of the tool and that the user group aims to develop further guidance for the use of the tool and hopes to consider a new interface facilitating the usability of the tool.

*Airborne input of hazardous substances, EMEP report and approval of the Baltic Sea Environment Fact Sheets*

5.50 The Session considered the report and the Baltic Sea Environmental Fact Sheets on inputs of selected hazardous substances (document 5-7, **presentation 7**).

5.51 The Session took note of the comments by the Chair of EG RedCore (document 5-12) including adding an explanation on why the data has not been recalculated as well as clarification of the model, constant emissions from Russia and contribution of other countries.

5.52 The Session proposed that the weather normalized data should also be presented in the sub-basin scale.

5.53 The Session recommended the publication of the report and BSEFSs after the comments by the Chair of EG RedCore and the Session have been taken into account.

5.54 The Session proposed that in the future, deposition could be presented on a similar geographical scale as in HOLAS (scale 2).

*Projects supporting the HELCOM work on hazardous substances*

5.55 The Session took note of the progress on the Baltic Sea biological effects activities, updates from the projects H-BEC (HELCOM Biological Effects of Contaminants), BEACON (Application of biological effects methods in monitoring and assessment of contaminants in the Baltic Sea), and the Detect2Protect project and the progress made under the joint Correspondence/Study Group SGEFF, the joint OSPAR-HELCOM group reviewing and updating biological effect monitoring guidelines.

5.56 The Session took note of the clarification on biological effects related pre-core indicators for the whole Baltic Sea that there is a draft list of updated guidelines and recommendations with 6-7 highly recommended indicators that will be provided with the final report of SGEFF.

5.57 The Session reviewed the HAZ-SHAP project final report (document 5-9) and recommended it for approval and to send it for layout and then publication on the HELCOM project website, and for publication by the Nordic Council of Ministers should they wish to do so.

5.58 The Session took note of updates on the activities of the EMPEREST (Eliminating Micro-Pollutants from Effluents for Reuse Strategies) project. The Session took note of information from CCB that a new report has been released in Sweden demonstrating alarming new data on drinking water samples containing PFAS substances.

5.59 The Session took note of the overview of PharmaSea project work (document 5-7), considered and supported the proposed outline for the report on pharmaceuticals in the Baltic Sea region and recommended that a separate longer priority pharmaceuticals list will be included as an Attachment to the report and on the HELCOM website to implement BSAP action HL23.

5.60 The Session took note of information presented by CCB (relating also to document 8-1 for this session) that there is a small project going on for developing managing pharmaceuticals in Ukraine, and for safe collecting and disposal of pharmaceuticals in the city of Lviv.

*Report on the activities of EG MoRS*

5.61 The Session took note of the update on the activities of the Expert Group on Radioactive Substances (EG MoRS) (document 5-13) and further noted that regarding the advice on radioactivity in phosphogypsum for TAG RPG there was information from Finland provided.

5.62 The Session took note that CCB has received information from a Polish NGO that has been already shared with the HELCOM Executive Secretary and HELCOM Chair that there is an ongoing

process for building a new nuclear power plant and possible lack of EIA public consultations that will probably be raised at the HOD level by CCB.

*Updates from EUBSRS PA Hazards*

5.63 The Session took note of updates from EUBSRS PA Hazards (**presentation 8**).

**Agenda Item 6 Agriculture**

*BAT/BEP for animal farming*

6.1 The Session considered the draft Recommendation on Best Available Technology (BAT) and Best Environmental Practice (BEP) to reduce greenhouse gas and nutrient emissions from manure (document 6-1-Rev1).

6.2 The Session took note that Sweden can otherwise support the draft Recommendation but is of the view that the reporting template is too detailed and should be further developed among the agricultural experts of WG Source to Sea before submitting it for adoption.

6.3 The Session took note of the view by Poland regarding the reporting template that duplication of reporting of data already reported to EUROSTAT is not useful. The Session further took note of the view by Poland that the document does not provide differentiation of which techniques and practices are suitable for small or big farms. The Session further noted the view of Poland that the analysis of cost of implementation is lacking from the document and a proposal to include short summaries of cost of implementation and cost-benefit analysis.

6.4 The Session took note of the clarification that implementing HELCOM Recommendations might always have economic consequences, but they are usually not considered under the Recommendations; however, if information on costs is available, it could be considered later how to best make it available taking also into account different investments needed for different sized farms.

6.5 The Session took note of the view of Germany supporting the document in its current version and in general agreeing on the proposed BAT/BEP. The Session further took note that Germany supports revising the reporting template of the draft Recommendation since some of the information might not easily be available and to avoid possible double reporting while still reporting directly to HELCOM and not just referring to other reporting systems.

6.6 The Session discussed slurry acidification and took note of clarifications on how it is included as BAT in the document, under chapters on housing, storage and spreading technologies, with the usual reason for using it being to reduce ammonia emissions and thus not to be considered a method for processing the manure. The Session noted Poland's view that slurry acidification significantly changes slurry properties, with consequences especially for occurrence of respective nitrogen compounds, and sulphur content. Higher sulphur rates in fertilization modify N and P dynamics in soil, periodically increasing nitrate leaching. Considering this, slurry acidification could be recognized rather like manure processing than reducing ammonia emission practices. The Session also took note that acidification can be done with other compounds than sulphuric acid, thus the changes related to sulphur are not necessarily always valid for acidification.

6.7 The Session took note of the clarification on the proposal on revising paragraph 3 in the Rev.1 version of the document 6-1, taking into account of the amended Industrial Emissions Directive, and proposed to check the exact wordings in the proposed text by Germany.

6.8 The Session recommended to organize a session for developing the reporting template for the interested group members and to aim for synergies with the PLC-9 project that is also gathering

basic information on agricultural practices for one of its assessment reports, invited the Secretariat to find a time for the session before the end of the year with the aim of finalizing the details of the draft Recommendation before the CMNT document DL (19 February 2025) of IC HELCOM 3-2025.

*Results of reporting on the implementation of HELCOM Recommendation 41/3 on the use of national manure standards*

6.9 The Session considered the reporting on the implementation of HELCOM Recommendation 41/3 on the use of national manure standards (document 6-2-Rev3).

6.10 The Session took note of the view by Finland that the reporting is mostly very informative and an invitation to provide more supporting information in the future on how the matters reported having been accomplished or ongoing are actually implemented for being able to compare the practices between the countries and learn from each other.

6.11 The Session took note that there were some unclarities in interpreting the reporting template in Germany and the views by Germany that the reporting is a good first review of the status while some of the responses were quite vague and not so useful for joint work especially on nutrient recycling which is still an emerging topic.

*Nutrient Recycling*

6.12 The Session took note of an update from the CiNURGi project (document 6-4).

6.13 The Session took note of the views by Germany that the recent nutrient recycling workshop organized by EUSBSR PA Nutri where also CiNURGi was presented was very informative and showing the major challenges related to nutrient recycling and that the countries are in very different stages in developing related research and practices with Finland being most advanced. Germany also proposed to consider the carbon footprints of the recycled fertilizers versus mineral fertilizers, assuming that recycled fertilizers perform better and that this could be an incentive to increase their use Currently, the fertilizer industry is one of the biggest producers of “hard-to-abate" CO2 emissions. The Session further took note that the Finnish Biocycle and Biogas Association has earlier developed a simplified carbon footprint calculator, which will be translated into English in the CiNURGi project, but that there is no possibility to develop the matter further under the current project.

6.14 The Session took note of the view of Sweden that the project is important in supporting implementation of several related BSAP actions and that Sweden is looking forward to the upcoming open webinar of the project on 18 November 2024.

6.15 The Session took note of the view of Poland that it is important to collaborate with EU especially in taking into account the European fertilizer market protection and development.

6.16 The Session took note that in the CiNURGi project, a workshop with policy outputs for HELCOM WG Source to sea consideration is planned together with PA Nutri. The Session further took note that the event would optimally take place in connection to the WG Source to sea session in autumn 2025. To enable this, the possibility of organizing the WG Source to sea autumn session 2025 as a live meeting in Helsinki will be discussed under AI 9.

6.17 The Session took note of the final results of the LEX4BIO project and the joint position paper of the five Horizon sister projects (document 6-5, **presentation 9**). The Session also took note of the clarification on the level of availability of nitrogen from BBF in Europe being based on available statistics on nutrient rich side streams and their nitrogen content and the amount of mineral fertilizers used in Europe, also taking into consideration the leaching and gaseous losses of nitrogen compared to phosphorus and the variable soil status around Europe.

*Best practices to improve soil structure and aggregate stability on clay soils*

6.18 The Session considered the next draft of the regional document on best practices to improve soil structure and aggregate stability on clay soils (document 6-3).

6.19 The Session took note of the proposals of Finland to update the texts under 3.1.1 on removal of compactions, carbon sequestration and on development of light machinery and under 3.1.3. on catch crops on growing root biomass and recommended to take them into account when finalizing the document.

6.20 The Session took note of the view of Germany supporting the document in its current version despite some critical national views on the new methods under chapter 4. The Session also took note of the clarification on the last sentence on the water holding capacity being dependent on soil compaction, and a proposal to add information on increased need for herbicides with no till. The Session proposed to add to this chapter information on conservation agriculture which includes no till, cover crops and crop rotation which would help to avoid the need for increased use of herbicides in no till.

6.21 The Session took note of information from Poland clarifying that the national programme mentioned as a policy measure addresses both liming to increase soil pH and structure liming.

6.22 The Session recommended the drafting group to update the draft document with the proposed changes and to aim for submission of a more finalized document for IC WG SOURCE TO SEA 5-2025.

6.23 The Session took note of the results of gypsum piloting in the Baltic Sea region in the context of the projects GYPREG and NordGypsum (document 6-6, **presentation 10**). The Session also took note of the clarification that several German institutions were contacted to have Germany onboard the projects but without success. The Session further took note of the clarification that many Finnish and US research results show that gypsum is both very economic and very efficient.

6.24 The Session took note of the view by CCB that the use of gypsum from phopshogypsum waste piles has been explored related to the work of TAG RPG and in many cases, there are challenges in radionuclides or heavy metals, depending on the source of phosphate rock used in phosphoric acid production.

6.25 The Session acknowledged that gypsum is only one tool to improve soil structure and diminish leaching of nutrients and all measures are needed.

*Climate change*

6.26 The Session noted that CCB considers climate change related matters constantly in their work e.g. related to the River University and Baltic Climate School as well as a movie to be finalized by the end of the year.

**Agenda Item 7 Eutrophication**

*Report on the activities of EG Eutro*

7.1 The Session took note of the information on activities of EG Eutro (document 7-7), recommended organization of the planned workshops, noted the next session of the group planned for the first quarter of 2025 and recommended for approval via correspondence the draft workplan of the group.

*HOLAS 4 development related to eutrophication*

7.2 The Session took note of the HOLAS review and development update for eutrophication (document 7-10) and considered and supported the prioritisation of issues within the HOLAS RevDev workplans.

7.3 The Session took note of the view by Poland that the revision of the guidance for and development of the HEAT tool with special focus on better linking coastal waters and open sea are of importance. The Session also took note that Poland supports incorporating ferry box and modelling data and invites EG Eutro to consider the possibility of incorporating data from buoys for HOLAS 4 or 5 to facilitate more frequent oxygen measurements. The Session further took note that Poland supports development of the oxygen depth indicator as well as developing a suitable threshold value for Secchi depth in the Pomeranian Bay sub-basin.

7.4 The Session noted that the prioritization of topics for HOLAS 4 development will be considered in all relevant expert and working groups and the national priorities for all topics, based on a questionnaire, are also discussed in WG GEAR. The Session acknowledged that additional funding is needed to implement the prioritized issues in the HOLAS 4 workplans and also noted that commonalities found in national priorities could help finding additional funding for the work.

7.5 The Session took note of the questions related to the use of HELCOM integrated assessments, with a particular focus on biodiversity (document 5-11).

7.6 The Session took note that out of all the integrated assessment outputs the assessment on eutrophication is the one that is used the most in Sweden.

7.7 The Session recalled that EG Eutro is planning a workshop on developing the HEAT tool on 16 January 2025.

*Baltic Sea Environment Fact Sheets related to eutrophication and hydrography*

7.8 The Session considered and recommended for approval the Baltic Sea Environment Fact Sheet on Wave climate in the Baltic Sea 2023 (document 8-4).

*Report on activities of EG RedCore*

7.9 The Session took note of the activities of EG RedCore noting that the group has not had any informal consultation sessions since IC WG SOURCE TO SEA 3-2024 but has supported PLC and hot spot work and the chair has commented on the BSEFS developed by EMEP.

7.10 The Session took note that planning the project on improving coherence of nutrient input targets and thresholds between the basins has progressed with additional planning meetings and that there are leads for work packages but it is yet to be considered which financing call would be suitable for the project. The Session also took note that the next planning meeting is to take place in January 2025.

7.11 The Session took note that the planned project is related to some of the issues included in the HOLAS 4 eutrophication workplan and that for some of the topics there could also be national financing available. The Session further took note that the project has a source-to-sea approach looking into open sea, coastal waters and the catchment and the proposal of utilizing the planned workshop in spring 2025 for developing the ideas.

7.12 The Session took note that it has been discussed if catchment modelling on measures should be included in the project. The Session also took note that Germany is considering if the MoRE model, which is used in Germany for modelling both nutrients and selected hazardous substances, could be used for this even for the whole Baltic Sea catchment acknowledging that in PLC projects estimating effectiveness of measures for the whole catchment has been challenging.

*NIC 2022 assessment and MAI core indicator update*

7.13 The Session discussed the proposed plan for finalizing the two NIC 2022 assessment products and the annual update of the MAI Core indicator on nutrient inputs to the Baltic Sea, took

note of the initial results of the MAI 2022 indicator (document 7-3, **presentation 11**) and recommended proceeding according to the proposed plan.

7.14 The Session noted the clarification that there can be a decreasing percentage of MAI exceedance but still no trend due to the fact that as the time series expands the uncertainty is reduced. The Session also noted that there has been discussion in the PLC-8 project on adjusting the normalization methodology or the trend analysis to take into account trends in flow.

7.15 The Session took note of the view by WWF highlighting that even with reductions there is a problem of too high nutrient inputs and more precise understanding of where the inputs are coming is needed. The Session recalled the upcoming assessment of sources of nutrients and noted that agriculture is the main source of nutrients to many basins.

7.16 The Session took note of the clarification that the three possibilities for trends are no trend, breakpoint with jump in the data or breakpoint with no jump and that a new trend can start in the same year or the next depending on the jump.

7.17 The Session reflected that 2022 was a very dry year in some sub-basins including the Baltic Proper, expressed concern over the increasing trend of nitrogen inputs to the Baltic Proper and acknowledged that the upcoming NIC results can help to determine where to focus efforts, noting the role of transboundary load and increased ammonia deposition from agriculture.

7.18 The Session highlighted the importance of the NIC assessment as a basis for updating EU MSFD programme of measures for Contracting Parties that are also EU Member States as well as the importance of receiving a draft report as early as possible in January 2025.

*Progress in implementing BSAP action E1 and the effectiveness of measures*

7.19 The Session considered the draft report on PLC-8 Effectiveness of measures to reduce nutrient inputs (document 7-11-Rev1, **presentation 12**).

7.20 The Session took note of Poland's questions regarding the information contained in Chapter 6 of the document stating that the biggest problem is monitoring overflows and stormwater, which varies depending on the regulations in force in a given country. There may be a problem related to the effects of overflows, such as the introduction of pollutants into rivers and water bodies, which can lead to eutrophication and degradation of water quality. Poland asked about the scope of information provided by the study, including how many such overflows have taken place recently and where exactly they occurred.

7.21 The Session took note that answers to the survey on stormwaters and scattered dwellings were not very detailed and were very variable and that some countries reported events of stormwater overflow but not on the content of contaminants in the overflows.

7.22 The Session took note of the proposal by WWF to reflect already in the name of the report that it deals mainly with point sources, noted that the original aim was to include information also on diffuse sources but it proved difficult and proposed to add a sub-heading reflecting the focus of the report.

7.23 The Session thanked the lead author and PLC-8 IG for drafting the report and pointed out that the report can help in the work of designating hot spots and revision of HELCOM Recommendation 28E/5.

7.24 The Session recalled that currently there is no financing for the effectiveness of measures work in PLC-9 and noted the proposal that if the financing becomes available, more information on scattered dwellings and stormwater overflows should be collected in PLC-9.

7.25 The Session recommended the document for approval as BSEP and invited the Contracting Parties to send possible editorial comments to the Secretariat (lotta.ruokanen@helcom.fi) by **8 November 2024**.

7.26 The Session discussed the final draft of the 2021 BSAP E1 action report (document 7-12).

7.27 The Session noted that the additional information on German measures in Odra River catchment originate from a joint report by countries of the Odra River Commission and are thus not all German measures. The Session invited the PLC-8 project manager to clarify this in the report and to add a footnote with the reference to the report.

7.28 The Session took note of the request by Germany to the PLC-8 project manager to lower the remaining reductions to Odra River in table 2.9. by taking into account the concentration targets at the limnic border and resulting load reductions as reported by the Odra Commission.

7.29 The Session discussed the expected nitrogen reductions from Baltic Sea and North Sea shipping (tables 2.6) noting that the information is based on data from the ENIRED project. The Session also noted that neither Baltic Sea nor North Sea shipping is expected to fulfil their reduction targets but Baltic Sea shipping would only fail the targets in Danish Straits and Kattegat. The Session recalled that based on information from the SCIPPER project, conducted after the ENIRED project, shipping will not meet the targets in any basin. The Session invited the project manager to include a footnote explaining the uncertainty of shipping meeting the targets and also considering to indicate this in the table.

7.30 The Session took note of the proposal by CCB to mention also other emissions from shipping such as greywaters and food waste and invited CCB to provide a paragraph on the matter for the PLC-8 project manager to be included in the report.

7.31 The Session took note of the Polish comment on page 32 chapter 3 on the share of agricultural load from Poland and noted the ongoing national discussion in Poland. The Session clarified that the shares in the report table are expected reductions and invited Poland to further clarify the matter with the PLC-8 project manager as soon as possible.

7.32 The Session recalled that the work is based on the implementation of BSAP action E1, added as an additional task to the PLC-8 project and acknowledged that if the report would be updated later, additional resources would be needed for the PLC-9 project.

7.33 The Session in principle recommended submitting the report to IC HOD 6-2024 for approval pending implementing the changes proposed by the Session.

7.34 The Session considered the brochure on messages from the PLC-8 Effectiveness of measures and 2021 BSAP action E1 report (document 7-13).

7.35 The Session proposed to change the order by starting with achieved and planned reductions, pointing out the difficulties in estimating effectiveness of measures related to diffuse sources and then moving on to point sources and also making the brochure shorter by considering deleting the section on national measures as this is not comparable information and only shortly mentioning the planned measures in the countries.

7.36 The Session highlighted that the items in the brochure need to be formulated to policy messages and proposed to include statements such as “reduction targets will not be reached” or “while we are quite certain on point source reduction, Contracting Parties struggle to estimate effectiveness of measures to reduce diffuse load” as headings.

7.37 The Session recommended establishing a short-term drafting group for finalizing the brochure with the aim of submitting a draft brochure to IC PLC-8 IG 11-2024 to be held on 16-17 December 2024. The Session proposed that the PLC-8 IG could decide if the brochure is ready enough

to be submitted for approval via correspondence by WG Source to sea followed by approval by IC HELCOM in March 2025 or if further work is needed. The Session invited the Secretariat to circulate a doodle poll for finding a time for a drafting session in November-early December 2024.

*PLC-8 project implementation report*

7.38 The Session took note of the progress of the PLC-8 project (document 7-16).

7.39 The Session considered the Applied PLC-8 methodology report (document 7-5) and recommended it for approval in correspondence procedure and publishing it as a project report.

7.40 The Session discussed the proposed plan for finalizing the PLC-8 source apportionment assessment (document 7-4 and **presentation 13**).

7.41 The Session took note of the clarification that all the PLC assessments products are based on timely and quality assured reporting of the Contracting Parties, and that the national monitoring and data reporting (both annual and the periodical that is used for this product) are based on the PLC-Water Guidelines and also explained in the Applied methodology report that is prepared once in every PLC project.

7.42 The Session further took note of the clarification that a specific source sector can be masked in large river catchments because of other nutrient sources and that local climatological circumstances also vary between the catchments having an effect on runoff that in turn has an effect to e.g. area specific losses visualized on maps in the assessment.

7.43 The Session took note of information from Poland that the PLC data coherence and procedures will be clarified between ministries.

7.44 The Session took note of a proposal by Germany to simplify the content of the PLC-8 source apportionment report, to investigate possibilities of making the material available as online data products and to consider publishing several smaller products out of the extensive data and analysis done rather than a single big report.

7.45 The Session took note that AquaINFRA project is developing processes to share some new online PLC data products or visualizations besides making the PLC data in general better available for large European freshwater and marine scientific communities via the data discovery and access system (DDAS) developed by the project, and that a proposal will be shared with the PLC-8 IG session in December.

7.46 The Session acknowledged that also the executive summary of the PLC-8 project could be used for having a more concise product out of the source assessment report and that further products could be planned based on the draft assessment in the beginning of 2025.

7.47 The Session recommended the final draft to be submitted to WG Source to Sea for consideration in a correspondence procedure after the last PLC-8 IG session in January 2025 with an aim to submit the source apportionment assessment to IC HELCOM 3-2025 in March 2025 for approval.

*Planning towards PLC-9 project*

*7.48* The Session took note of the planning towards the Ninth Baltic Sea Pollution Load Compilation (PLC-9) project with already preparing the PLC-Water Guidelines update, PLC statistical methodologies report and the upcoming laboratory intercalibration for the PLC-9 (document 7-17).

*7.49* The Session took note of the clarification that there might be a need to revise the Annex of the Recommendation 37-38-2 Rev.1 on monitoring of airborne pollution inputs during the PLC-9 project and that if needed the project implementation group together with EG RedCore and EG Haz will prepare the matter for WG Source to Sea for consideration.

*7.50* The Session invited Contracting Parties to nominate members to the PLC-9 project implementation group via the HELCOM Meeting Portal (group: PLC-9 IG).

*7.51* The Session recalled that the optional parts of the project to be implemented in 2027-28 (the big rivers report, effectiveness of measures report and the assessment on hazardous substances) are still lacking the needed financing in the PLC-9 project budget and invited the Contracting Parties to consider possibilities to find resources for these parts of the project.

*Phosphogypsum waste site management*

7.52 The Session took note of the progress by the Technical Advisory Group on Reduction of Discharges from Phosphogypsum Waste Sites and thanked the group for the efficient and valuable work so far (document 7-2).

7.53 The Session considered the draft background report and Recommendation on sustainable management, utilization and safe disposal of phosphogypsum.

7.54 The Session took note that there is new information on a third phosphogypsum site higher upstream in Poland that has not been considered before and invited Poland to check the matter for updating the background report accordingly.

7.55 The Session took note of the clarification that the very questionable numbers for the Kedainiai stack phosphorus releases in table 1 of the draft report that are based on 2017-18 reporting and were one of the original reasons not to approve the earlier draft report in 2021 and that the table has not yet been updated.

7.56 The Session took note of the clarification by Lithuania that there is recirculation of phosphorus containing waters back to the process from the stack, that there is monitoring of ground water and surface waters in place and that one of the monitoring points is a national one.

7.57 The Session further took note of the clarification by Lithuania that there is a lot of agriculture and also fish farming on the catchment upstream from the phosphogypsum site and other industries such as a sugar factory close to it. The Session further took note of the clarification that the municipality numbers referred to by the Chair of TAG RPG include monitoring in the catchment from also other industries and that the origin of the high phosphorus levels was not found.

7.58 The Session welcomed the information from Lithuania that updates on the Lifosa site information will be prepared and submitted to TAG RPG before their next session on 8 November and invited Lithuania and TAG RPG Chair to be in contact with correcting and updating the data.

7.59 The Session took note of information from Finland that the current eutrophication status around the Uusikaupunki site is due to earlier heavy nutrient loading and resulting internal loading from the sediments with high phosphorus content and a clarification that the phosphogypsum stack area outside the isolation wall is on land protected by moraine and not in the sea.

7.60 The Session took note that Finland has proposed TAG RPG work to be fed in the currently ongoing LVIC BREF revision process with the BAT/BEP of the draft Recommendation so that Finland would bring these matters to the EU process.

7.61 The Session discussed the proposed remediating methods and a proposal to cover sea banks e.g. with concrete and how to take into account the hazardous substances such as mercury and radionuclides in them.

7.62 The Session invited the Contracting Parties to finalize their input to the background report and to provide updates and comments to the draft report by **6 November 2024** and recommended TAG RPG to finalize the work for the draft Recommendation and the draft background report soon after it with an aim of submitting them to the IC HOD 6-2024.

*Reviewing HELCOM Recommendation 28E/5 on municipal wastewater treatment*

7.63 The Session took note of the updated comparison between the revised EU UWWTD and HELCOM Recommendation 28E-5 (document 7-14) and that the final revised Directive is expected to be finally approved in two weeks.

*Initiating the work for the BSAP action E28 on reduction of phosphorus in detergents for industrial and institutional use*

7.64 The Session discussed the implementation of BSAP action E28 on reduction of phosphorus in detergents for industrial and institutional use that is a supporting action. The Session took note of information that Sweden has already regulation in place for the matter and a proposal that implementation of BSAP action E28 could be discussed with the review of the recommendation 28E/5.

7.65 The Session recommended to come back to the matter in IC WG SOURCE TO SEA 5-2025.

*Internal loading*

7.66 The Session took note of information from Latvia and Germany on national work and projects related to internal loading (document 7-15). The Session acknowledged that it would be very useful to have more countries and examples gathered to further plan the joint work and invited the Contracting Parties to provide more examples and inputs on the matter and fill in the template before IC WG SOURCE TO SEA 5-2025.

7.67 The Session took note of a study on modelled effects of engineered oxygenation of deep water in the Baltic Sea (document 7-6 and **presentation 14**). The Session further took note that also BNI has done similar modelling earlier and of the view that it was good to have the expected phosphorus dynamics captured in the results of this project.

7.68 The Session acknowledged that the message for policy makers from the results should be clear, i.e. that these kinds of quick fixes won't resolve the challenge of deep water anoxia.

7.69 The Session took note of information that there have been proposals to use pure oxygen that is a side stream of hydrogen production for similar purposes, but that pumping pure oxygen being also toxic to some organisms would mean extensive bubble formation and causing avoidance behaviour of marine animals with creating a security issue and massive energy consumption and that also disturbances to stratification would be expected.

*Updates from EUSBSR PA Nutri*

7.70 The Session took note of the updates from the EUSBSR Policy Area Nutri coordination (document 7-18, **presentation 15**). The Session supported the proposal that the revision of the EUSBSR Action Plan could help implementing some of the national 2021 BSAP actions.

7.71 The Session took note of the proposals by CCB that e.g. BSAP E28, branding nutrient recycling e.g. via labelling products produced with them and institutionalizing organization of the GRASS conferences could be supported by PA Nutri. The Session further took note that CCB appreciates a lot the PA Nutri project supporting Ukrainian water utilities with SI funding.

7.72 The Session invited PA Nutri coordinator to be in contact with CCB on joining the upcoming PA steering group meeting.

*Draft policy brief on airborne nitrogen*

7.73 The Session considered the draft policy brief on sectoral airborne nitrogen inputs (document 7-9) and in general supported the format and length of the brief as fit for purpose for providing messages for policy makers.

7.74 The Session proposed to use only the second pie chart with referring to the emission information only in the text, and to reformulate the titles of the messages towards action. The Session further proposed to add a figure on compliance of the Gothenburg Protocol by 2020.

7.75 The Session took note of the proposal by Sweden to consider reorganizing the content to present the messages first and after them the background and to change text in table 1 from "not determined" to "not confirmed". The Session took note of the clarification that usually the messages are presented in the end of the policy briefs but that the layouting clearly highlights them.

7.76 The Session recommended the draft policy brief to be approved in a correspondence procedure and to aim for submitting it to the IC HOD 6-2024, with presenting the actual policy messages in the cover of that document.

*Baltic Sea Environment Fact Sheets on airborne nitrogen inputs*

7.77 The Session considered the report and the Baltic Sea Environmental Fact Sheets on airborne inputs of nitrogen (document 7-8, **presentation 16**.

7.78 The Session invited the Contracting Parties to submit any editorial comments by **1 November 2024** to EMEP MSC-W (michael.gauss@met.no), MSC-W to submit updated drafts to the Secretariat by **8 November 2024** (lotta.ruokanen@helcom.fi) and recommended them for approval after the comments by the Contracting parties and by the Chair of EG RedCore (document 5-12) have been taken into account.

7.79 The Session took note of the clarification that the project on EU prognosis for 2030 and 2040 mentioned in presentation 16 concerns only nitrogen, ozone and PM but not hazardous substances.

**Agenda Item 8 Any other business**

8.1 The Session took note of the draft Green Recovery Plan for Ukraine (Vistula River basin) (document 8-1). The Session thanked CCB for the work being done, appreciating it being in line with the international HELCOM and EU acquis.

8.2 The Session took note that the list of contacts of the group can be accessed in the new HELCOM Meeting Portal.

8.3 The Session took note of the view of Germany that the routines of the Working Group are well established but the session for agricultural matters and also the matters related to monitoring and assessments are quite short and it would be good to discuss how these matters would be well enough represented in future sessions of the group. The Session further took note that Poland supports to have either more time or a dedicated group for agricultural matters.

8.4 The Session recalled that there have been plans to review the current working structure and there is guidance expected on the matter for Working Groups.

8.5 The Session took note that Germany is still supporting the implementation for the BSAP action E23 on strengthening the HELCOM Recommendation 28E/5 and BSAP action E28 on detergents but there are resource and expertise constraints.

**Agenda Item 9 Future work and sessions**

*Planning for the implementation, reporting and possible revision of HELCOM Recommendations of relevance for the group*

9.1 The Session invited the Contracting Parties to submit comments to the draft reporting templates on the implementation of the following Recommendations before IC WG SOURCE TO SEA 5-2025 (document 9-2) to be able to report on their implementation during 2025:

- 18/4/1997 Managing Wetlands and Freshwater Ecosystems for Retention of Nutrients
- 25/3/2004 Reduction of Nutrients and other Pollutants leaching from forestry land and to come back to the matter.

9.2 The Session discussed the Recommendation 38/1 implementation and recalled that there was the plan to use the relevant revised EU Directive reporting due in 2023 and that the matter is included in the draft workplan for the group.

9.3 The Session took note of the view by CCB that reporting on the Recommendations could be more transparently presented in the HELCOM Explorer. The Session took note of the clarification that the 2019 reporting of the Recommendations used for the BSAP update process is available in the Explorer and proposed to bring the matter of adding reporting on new Recommendations to HOD for approval.

*Review the workplan of the group and tracking the implementation of BSAP actions under the mandate of the group*

9.4 The Session considered progress in implementing the 2023-2024 workplan of WG Source to Sea including a self-evaluation of progress on relevant BSAP actions (document 9-1), recalled the status of securing funding for the implementation of joint BSAP actions and noted that WG GEAR will continue discussion on financing gaps after the evaluation of the workplans of HELCOM Working Groups and that the status will be submitted for IC HOD 7-2025.

9.5 The Session acknowledged that information on financing gaps is very useful in planning the work of the group.

9.6 The Session reviewed the progress in implementing the 2023-2024 workplan and relevant BSAP actions and supported the review as in document 9-1-Att1.

9.7 The Session recommended for approval the updated workplan of WG Source to Sea 2025-2026 as included in **Annex 2** (separate Excel attachment, Memo-Att1).

*Next sessions*

9.8 The Session recommended organizing IC WG SOURCE TO SEA 5-2025 on 6-9 May 2025 as an in-person session back-to-back with the source-to-sea workshop on 5 May 2025 and welcomed the possibility of Estonia to consider hosting it tentatively in Estonia.

9.9 The Session recommended organizing IC WG SOURCE TO SEA 6-2025 tentatively on 21-24 October 2025 also as an in-person session, back-to-back with the workshop considering nutrient recycling policy outputs organized by the CiNURGi project and EUSBSR PA Nutri on 20 October 2025 with the host to be confirmed.

**Agenda Item 10 Memo of the Session**

10.1 The Session approved the draft Memo of the Session.

# Annex 1. List of participants

| Participant | Representing | Organization | Email |
|---|---|---|---|
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