II Parallel Audit of Implementation of the Provisions of the Helsinki Convention

Preparedness to combat pollution from ships in the Baltic Sea

Conducted by:
The National Audit Office of Denmark
The State Audit Office of Estonia
The State Audit Office of Finland
The German Federal Court of Audit
The State Audit Office of Latvia
The State Control of the Republic of Lithuania
The Supreme Chamber of Control of the Republic of Poland
The Accounts Chamber of the Russian Federation

EUROSAI
Working Group
on Environmental Auditing

International cooperation on environmental audit

- The international cooperation in environmental audit in Europe has been promoted by EUROSAIs (European Organisation of Supreme Audit Institutions) Working Group on Environmental Auditing chaired by the Supreme Audit Institution of Poland.
- In 2000, the first parallel audit of implementation of article 6 of the Helsinki Convention concerning pollution from land-based sources. Coordinated by the Supreme Audit Institution of Poland.
- In 2004, the second parallel audit of implementation of article 8, 13, 14 and 16 of the Helsinki Convention concerning pollution from ships. The audit was coordinated by the Supreme Audit Institution of Denmark.

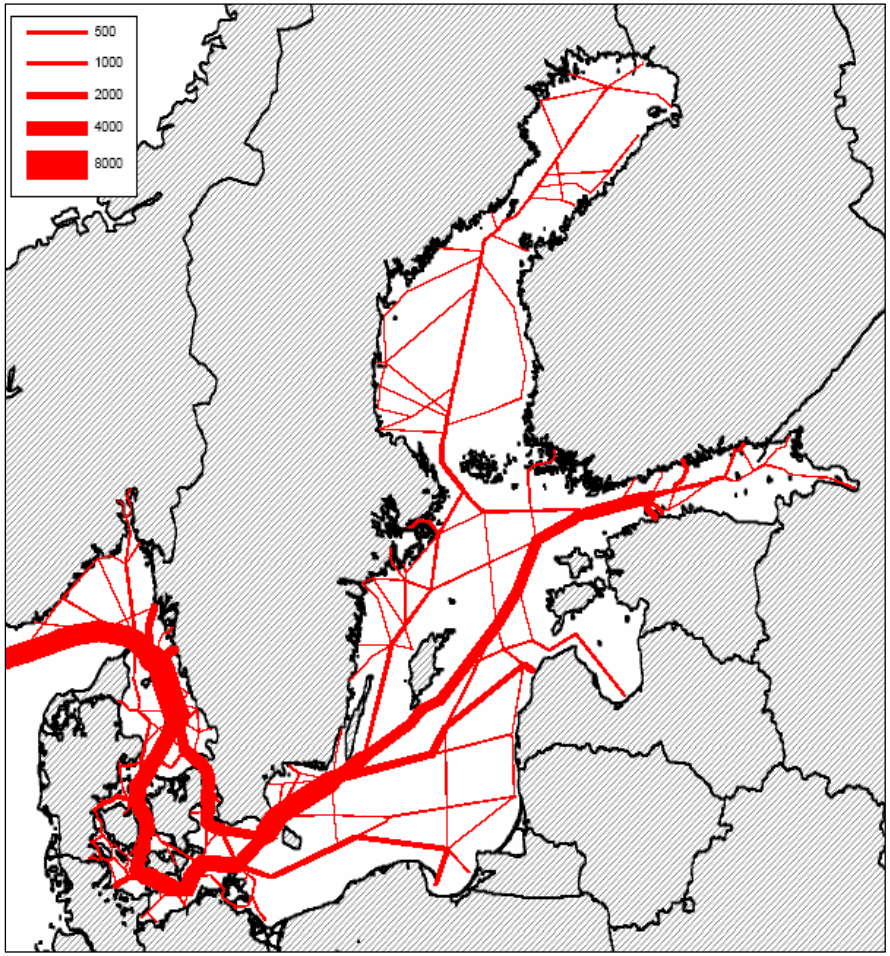
Scope and objectives of the parallel audit of the Helsinki Convention

- Implementation of the articles concerning pollution from ships:
  - Article 8 - Prevention of pollution from ships.
  - Article 13 – Notification an consultation on pollution incidents.
  - Article 14 – Cooperation in combating marine pollution.
  - Article 16 – Reporting and exchange of information.
- The objectives of the audit were to assess whether the national authorities comply with the provisions of these articles (including annexes and recommendations).

Why this parallel audit?

- Increasing volume of oil and other goods transported through the Baltic Sea.
- Risk of pollution from heavy oil as the shipping of crude oil in the Baltic Sea is increasing dramatically.
- Therefore, government measures for preventing, detecting and eliminating pollution from ships should be effective.
- Good environmental protection depends on effective international cooperation.

Estimated distribution of 1998 annual ship traffic (number of movements) in the Baltic Sea, oil tankers



Reporting of the audit results

- National reports forwarded to the national authorities and parliaments.
- Joint Final Report forwarded to the national authorities, parliaments and the Helsinki Convention Commission.

Waste reception facilities in ports

Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
☺	☺	☺	☺	☺	☺	☺

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

- Waste reception facilities in ports are established in all countries including Russia.
- However, in several of the countries, the national authorities do not register the amount of received waste and do not inspect the waste reception facilities.

Mandatory discharge of waste

Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
😐	😐	😐	🙂	😐	🙂	😐

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

- Mandatory discharge of waste is fully implemented in 3 of the 8 countries including Russia.
- In general shipping companies apparently are not aware of the provisions of mandatory discharge of waste.

The “no-special-fee-system”

Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
☺	😐	☺	☺	😐	😐	😐

Smiling man: The provisions are implemented.
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Displeased man: The provisions are not implemented.

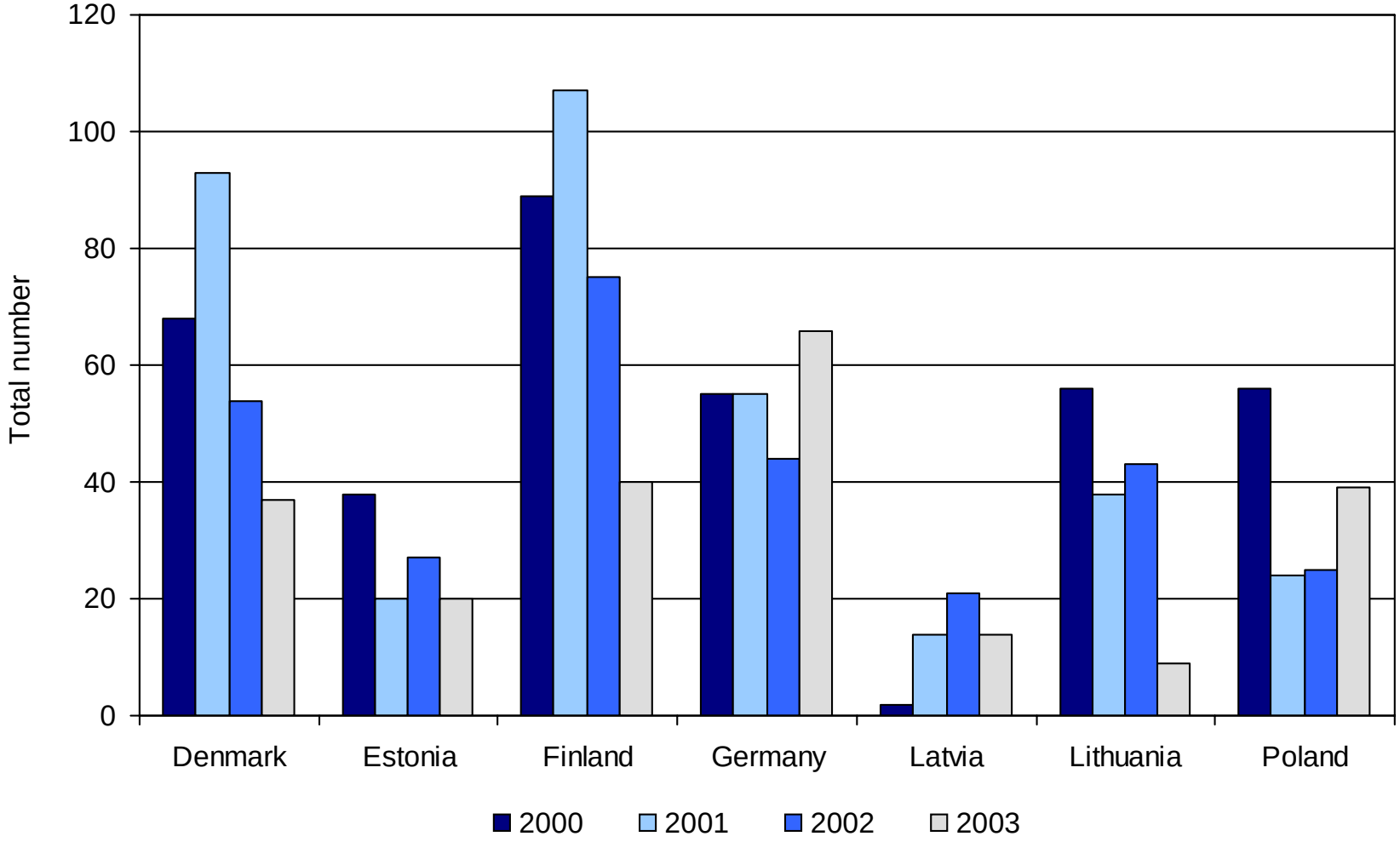
- The “no-special-fee-system” is fully implemented in 3 of the countries.

Surveillance activities

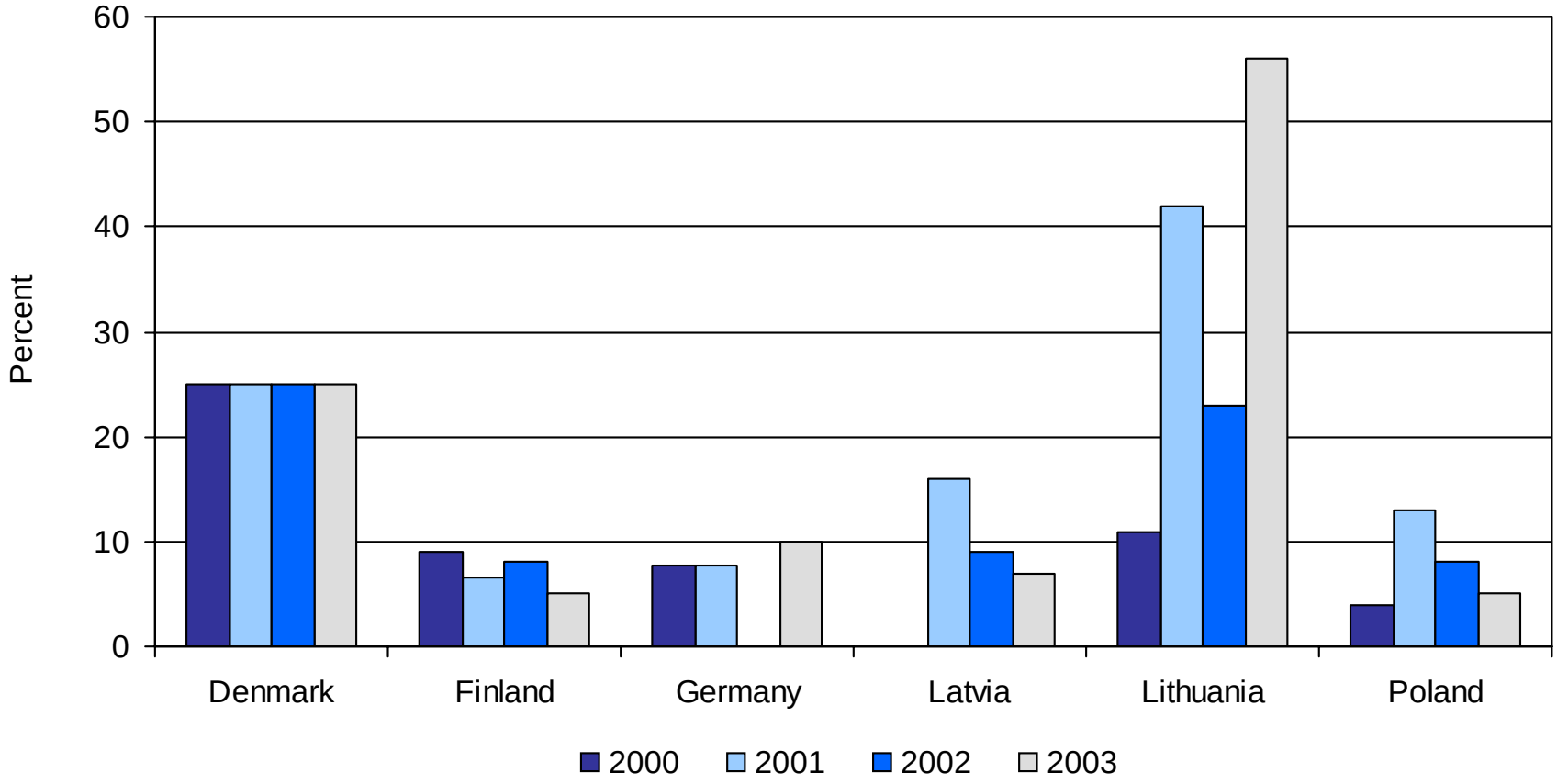
	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
National plan for surveillance implemented	☺	☹	☺	☺	☺	☹	☹
Surveillance activities carried out by:							
- Aircraft	☺	☺	☺	☺	☺	☺	☺
- Ship	☺	☹	☺	☺	☺	☺	☺
- Satellite	☺	☹	☺	☹	☹	☹	☹
Surveillance in co-operation with other countries	☺	☹	☺	☺	☹	☹	☹

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Oil spills discovered



Oil spills with identification of the polluter



Surveillance activities

- 4 of the 7 countries have implemented a national plan for surveillance.
- Most of the planned flights have been carried out from 2000 to 2003.
- However, the number of pollution incidents detected and of polluters identified seems to be rather small given the large volume of shipping in the Baltic Sea.

National contingency plan

Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
☺	😐	☹	☺	☺	☺	😐

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

- 5 of the 8 countries do have national contingency plans including Russia.

Requirements of recommendation 11/13

	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
Keeping a readiness permitting the first response unit to start from its base within 2 hours after having been alerted	☺	☺	☺	☺	☺	☺	☺

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Requirements of recommendation 11/13

	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
Reaching within 6 hours from start any place of a spillage that may occur in the re-sponse zone	😐	😐	😐	☺	☺	☺	😐

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Requirements of recommendation 11/13

	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
Ensuring well organized adequate response actions on the site of the spill within a time not exceeding 12 hours	☺	☺	☺	☺	☺	☺	😐

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Requirements of recommendation 11/13

	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
Combat major oil spillages with mechanical pick-up devices within a period of time not exceeding 2 days	☺	☹	☺	☺	☺	☺	😐

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Requirements of recommendation 11/13

	Denmark	Estonia	Finland	Germany	Latvia	Lithuania	Poland
Make available sufficient storage capacity for disposal of recovered oil within 24 hours	☺	☹	☺	☺	☺	☺	☺

Smiling man: The provisions are implemented.
Not very pleased man: The provisions are partly implemented.
Displeased man: The provisions are not implemented.

Pollution response equipment

- The success of combating pollution depends on the short term readiness of combating ships, manpower and equipment. Therefore, the Helsinki Convention requires a first-response capacity (recommendation 11/13).
- Recommendation 11/13 is only partly implemented in the 7 countries.
- In general, the national authorities have not sufficiently planned, supervised and controlled the implementation of these provisions.
- It is uncertain whether the equipment and contingency plans will work in reality.

Other audit results

- The countries have to arrange operational exercises. Most of the countries participate in joint exercises in order to maintain a high degree of response readiness. However, these exercises are not very often conducted during bad weather and the winter season.

- The parallel audit showed that in general there seems to be only very little exchange of information on research and development programs between the countries.

- The parallel audit showed that most of the countries have implemented procedures to ensure efficient and reliable notification and consultation on pollution accidents.

Other audit results

- There is an urgent need for comprehensive and realistic assessments because of the dramatic increase in oil shipping in the Baltic Sea.
- In general, there is a need for more co-operation, exchange of information on research and sharing of good practice.
- In the light of growing transportation of oil, it is very important that the countries around the Baltic Sea strengthen their cooperation on reducing the risks of oil pollution.

The audit results from Russia

- The Accounts Chamber of the Russian Federation believes that the attention of the national authorities on the implementation of the Helsinki Convention has risen significantly in recent years.
- Intense law-making activities have ensured that the Russian legislation now generally reflects the provisions.
- However, there is extremely tight public funds in Russia for the protection of the marine environment, including aerial surveillance of marine waters in the Baltic Sea and adequate emergency capacity.
- Coordination between the federal and regional authorities could be improved. Plans are not sufficiently compatible and consistent.

Lessons Learned: Should a joint audit report finalise each international environmental audit?

- No not everytime. It depends on the subject and the scope of the audit.
- If it is important and make sense to focus on comparative data.
- If comparative data is validated and of high quality and indicate best practice or lessons learned.
- The joint final report need to be forwarded to national and/or international authorities.

Lessons Learned:
Alternative to a joint final report

- International expert working group to focus and facilitate the audit as an sparring partner.
- Develop audit criteria and methodologies and agree on the scope of the audit.
- Discuss objectives, audit findings, common problems and possibilities.
- Workshops.

Lessons Learned: Important tasks

- Agree on an overall audit plan.
- Crucial to define the relevant comparative data.
- Agree on scope and content of the summaries of the national reports.
- Agree on a common scale for assessments/ critics.
- Timetable, extra slope for validation of data, unforseen events and delays.