



Document title	Proposals by Denmark on the new paragraph on nutrient recycling in the Annex III part II
Code	4-2
Category	CMNT
Agenda Item	4 - Revision of part 2 of Annex III of the Helsinki Convention
Submission date	6.4.2021
Submitted by	Denmark
Reference	

Background

This document provides a comment by Denmark to the document 4-1.

HOD 59-2020 in general supported the new paragraph on nutrient recycling, taking note of a study reservation by Denmark on the first two bullet points of the new paragraph on nutrient recycling. HELCOM 42-2021 noted that Denmark is not in the position to lift their study reservation on the nutrient recycling paragraph of the revised Part 2 Annex III and that Denmark will provide written proposal on the issue to AGRI 11-2021.

The main concern of Denmark is that one may confuse the wording “nutrient recycling strategies” with the title of the HELCOM strategy “Baltic Sea Regional Nutrient Recycling Strategy” to be finally decided on the HELCOM ministerial meeting in October this year. Denmark understands that the nutrient recycling strategies mentioned in the new paragraph is different from (but can be inspired by) the HELCOM Nutrient recycling strategy.

In this respect, Denmark suggests replacing the word “strategies” with, e.g., “plans” to prevent future misinterpretation of the paragraph. Alternative, one could insert the word “national”, or one could include both changes. The suggestion is given in the Annex to this document.

A second issue concerns the first and second bullet points “providing current sub-national level information”; what does the word “providing” imply, and to whom should the information be provided? Denmark does not expect that there will be any obligation for countries to deliver information to HELCOM or elsewhere. Otherwise, this should be stated explicitly by referring to a reporting obligation, if such is stated elsewhere.

Action requested:

The Meeting is invited to consider the changes proposed by Denmark, clarify the expressed concerns, and elaborate an acceptable solution.

Proposal by Denmark to change
Draft new paragraph on nutrient recycling
Agreed by the drafting group

In order to reduce nutrient loss to the Baltic Sea and to achieve nutrient saving, efficient use of nutrient resources in agriculture and recovery of nutrients from various flows in society back to agriculture, countries are encouraged to design and implement **national** nutrient recycling **plans strategies**, which should include:

- providing current sub-national level information about production of organic residual materials, especially livestock manure and sewage sludge;
- providing current sub-national level information of the nutrient status of fields, and national soil maps particularly in regard to phosphorus;
- enabling the development of markets for recycled organic fertilizers with the aim of promoting sub- and/or transnational level reallocation of nutrients, including replacement of mineral fertilizers;
- developing actions for improved recycled fertilizer production, including information of product safety, usability, production technologies and logistical solutions;
- encouraging close cooperation between livestock and crop producers to use nutrients efficiently and to secure soil fertility;