



## Baltic Marine Environment Protection Commission

Group on Sustainable Agricultural Practices  
Warsaw, Poland, 8 November 2018

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### Background

The attached document contains notes from WWF Baltic Ecoregion Programme regarding the revision of Annex III part II of the Helsinki Convention.

### Action requested

The Meeting is invited to take note of the information.

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## Notes from WWF Baltic Ecoregion Programme regarding revision of Annex III part II of the Helsinki Convention

There is some concern in relation to the current drafts regarding revision of Annex III part II of the Helsinki Convention. The revision should lead to improved protection of the Baltic Sea ecosystem from the impacts of agriculture on the catchment area and contribute thus to achieving the agreed nutrient run-off reductions – this should be the main goal. Current drafts while making a welcome contribution to some of the measures needed to reach this goal are not sufficient for that and in some cases might even be a step backwards.

In the notes from the online meeting of the drafting group on revising Annex III part II of the Helsinki Convention of 28<sup>th</sup> of August 2017 there is a justified reference to regulating other types of fertiliser than organic. Indeed, the input of mineral fertiliser is definitely the main part of the problem on the large scale, as animals are not able to add nutrients to the system – all the N&P in manure originates from the fodder. According to the European Nitrogen Assessment of 2011 more than two thirds of the N inputs to EU agriculture come from mineral fertiliser (ENA 2011). It is therefore not surprising that mineral N fertiliser use and N surplus are strongly correlated on the country level (Lotman & Kasak 2017). It is hence instrumental that the revision of Annex III part 2 of the Helsinki Convention would take the need to limit the use of mineral fertiliser into account. Indeed, already in the first report for BERAS project "Policy interventions for ecological recycling agriculture" Peter Einarsson wrote that nutrient management legislation should be focussed on total N&P application in agriculture, not just manure, as artificial fertilisers are the root cause of nutrient surplus. WWF reiterated the need to take all fertilisers, not only organic, into account at the online meeting on 25<sup>th</sup> of September 2018.

WWF welcomes the commitment by Contracting Parties not to weaken the current regulations of Annex III part II as the notes from online meetings of the drafting group from 28<sup>th</sup> of August 2017 and 25<sup>th</sup> of September 2018 also show. We consider it necessary to put this general commitment into practice while revising the Annex and would draw attention of Contracting Parties to the following shortcomings of the current proposals. Draft revised Regulation 2 Item 3 proposes allowing less than 6 month storage in case "it is sufficiently justified by farm's specific organizational conditions, for example, when livestock manures produced in a farm are subject to technological processing or delivery". This is very generic and can lead to weakened protection of the Baltic Sea. Draft revised regulation 2 Item 6 weakens the current provision, as it does not mention the currently stipulated principle of incorporating manure as soon as possible. Draft revised Regulation 2 Item 7 propose to use bigger quantities of manure N if "justified by a high nitrogen use efficiency based on nutrient balance at the regional or country's scale". This again is very vague and can indeed result in increased nutrient loadings. Therefore WWF asks to strengthen the draft proposals, and add additional regulations on mineral fertilisers. We need strong Annex III in order to reach the goal of the Baltic Sea unaffected by man-made eutrophication.

### References:

Einarsson, P. Policy interventions for ecological recycling agriculture. BERAS Implementation Reports No. 1. Available online: <http://beras.eu/publications/policy/>

ENA 2011. European Nitrogen Assessment. Edited by Mark A. Sutton, Clare M. Howard, Jan Willem Erisman, Gilles Billen, Albert Bleeker, Pering Grennfelt, Hans van Grinsven, Bruna Grizzetti. Cambridge University Press 2011. Available online: <http://www.nine-esf.org/node/360/ENA-Book.html>

Lotman, A. & Kasak, K., 2017. EU Common Agricultural Policy direct payments, Nitrogen balance and eutrophication of the Baltic Sea. Available online: <http://estcap.blogspot.com/2017/08/article-eu-common-agricultural-policy.html>