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## Background

Germany would like to make the following statement regarding the issue of managing internal nutrient reserves, since such measures constitute a paradigm shift in eutrophication management. Applying any of these measures has the potential to cause long-lasting, uncontrollable adverse effects to the marine environment. Furthermore, Germany sees the moral hazard of such measures, this means the possibility that land-based efforts to reduce nutrient inputs might be reduced once sea-based measures are operational. Germany is of the opinion that currently the potential for land-based measures and well as measures in the shipping sectors are far from being exhausted and that the management of eutrophication in the Baltic Sea therefore needs to have a continued focus on measures at source. Any scientific research on this subject needs to focus on improving the knowledge base regarding the nature and dynamics of internal nutrient reserves. Research that conducts measures to manage internal nutrient reserves needs to come under a permit regime following a risk assessment framework to be developed in HELCOM. The regulation of marine geoengineering, in particular ocean fertilization, under the London Protocol should serve as a blueprint for the development of such an assessment framework. As a next step a broader discussion in HELCOM on this topic needs to be initiated, involving all Contracting Parties and affected working groups such as WG S&C and WG PRESSURE in order to develop a better understanding of the potential consequences of such sea-based measures.

## Action requested

The Meeting is invited to take note of the statement by Germany.