



Document title	Russian comments to the documents: 2-7 Background for regional nutrient recycling strategy, 3-11 Assessment of nutrient input by seven biggest rivers , 3-14 Outcomes of working groups' meetings
Code	2-8
Category	CMNT
Agenda Item	2 –Preparations for HELCOM 39-2018 and HELCOM Ministerial Meeting 2018
Submission date	7.12.2017
Submitted by	Russia
Reference	documents 2-7, 3-11, 3-14 HOD 53-2017

Please note that this document also concerns Agenda Item 3 Matters arising from the HELCOM Groups.

Background

Russia forwards the following comments with regards to the submitted documents

Document 2-7 Background for regional nutrient recycling strategy

- With the aim of possibility to apply useful components of sewage sludge, the Contracting Parties are to develop and accept the legal acts forcing the use of the mentioned above substance for soil enrichment
- To regulate not only the total maximum amount of odd substances, but also their labile forms in accordance to soil use:
 - For agricultural land uses and private gardening – regulating by labile forms – нормирование по подвижным формам; for other territories – regulating by total amount.
 - Strategy should be based on tested technological solutions of sewage sludge useful appliance.
- After extracting phosphorus from sewage sludge the possibility of using recycled sludge or its derived products as a construction mixture ingredient might be implemented.
- Concentration of odd substances depending on amount of phosphorus in sludge should be regulated (if the amount of phosphorus > 5 mg/kg in waste waters, the concentration of the heavy metals requirements should be less strict).
- Cinder after sewage sludge burning should be considered as a product for fertilizers.

Document 3-11 Assessment of nutrient input by seven biggest rivers

p. 2. Table 1. Please correct figures for Neva as stated below:

	AREA, km ²	Lenght, (km)	Population	Population density, people per km ²	Cultivated area (%)	Urban (paved) areas (%)	Forests (%)	Inland waters (%)	Other areas
Neva	281 600	74 (only Neva)	610800	22 ¹	12	0,1	55	17	15,9

¹ The population is mainly concentrated in Saint-Petersburg

- Reference: Informational resources related to the implementation Federal target program «Development of Water Sector of the Russian Federation in 2012-2020». <http://water-rf.ru/>

Figures 8,15,22, 29, 36, 43, 50

- The color scheme for illustrating area specific loads creates confusion because the same colors are used to represent different values for rivers (e.g. dark brown is used to illustrate both area specific P loads - 30 kg/km² for Oder river and 8.5 kg/km² for Neva). The color scheme can be adjusted based on values for all big seven or one map where load values for all rivers demonstrated can be included to avoid the confusion.

Document 3-14 Outcomes of working groups' meetings

-PRESSURE

- Russia has reported nitrogen emission data for 2015 (http://www.ceip.at/ms/ceip_home1/ceip_home/status_reporting/2017_submissions/). We kindly ask to include this in the latest EMEP assessment and use it in follow-up assessments of progress towards CARTs/input ceilings.

Action requested

The Meeting is invited to take note of the comments and use those as appropriate when discussing the documents and the outcome of working groups meetings.