



Document title	Comments to Doc. 3-4 Proposal to update HELCOM Recommendation 23-5
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Submitted by	Finland
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Background and comments

Finland thanks CCB for the proposal of the revised Recommendation and compiling national available information on major stormwater issues, pollutants and treatment methods. The document provides a good starting point for the revision of Recommendation 23-5.

Finland agrees that significant revision of the Recommendation is needed along with the current knowledge of climate change effects on stormwater management and new and emerging nature-based solutions and technologies. As the proposed Recommendations presented in Appendix 1 of Doc [3-4](#) are closely linked with several sectors including land use and city planning, building, etc., we would like to involve a wider range of stakeholders and authorities to discuss on the best available techniques (BAT) and best environmental practices (BEP) and linkages to the present EU/national regulation.

Finland would also like to discuss how to structure the revised Recommendation, and whether it could be supported by a BAT/BEP guidance document.

Action requested

The Meeting is invited to take note of Finland's comments.