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<b>Document title</b>	Reporting on HELCOM Recommendations adopted before 2007
<b>Code</b>	6-5
<b>Category</b>	DEC
<b>Agenda Item</b>	6 - Update of the Baltic Sea Action Plan and associated activities
<b>Submission date</b>	27.3.2020
<b>Submitted by</b>	Secretariat
<b>Reference</b>	

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### Background

A large number of HELCOM Recommendations, which have been adopted since the 1980s, fall under the mandate of the Pressure Working Group. Thus, the follow-up of the Recommendations was arranged in two stages. The implementation of actions from the Recommendations adopted after 2007 (the year when the BSAP was adopted) were reported first. In order to optimize the follow-up of the implementation of actions from the Recommendations adopted before 2007, they were evaluated against recent legislation common for the EU member states and Russian Federation. The actions which have been already integrated into the common legal requirements for the EU member states were suggested to be set aside of the current reporting, being considered as implemented. PRESSURE 10-2019 agreed on the actions from HELCOM Recommendations adopted before 2007 to be included into the reporting in 2019.

PRESSURE 11-2019 took note of the reporting on Recommendations adopted before 2007, which was yet not complete and invited the countries that have not yet reported to do so as soon as possible.

HOD 57-2019 took note of the reporting by all countries for the Recommendations under Pressure Working Group adopted after 2007 and the reporting by Estonia, Finland, Germany, Lithuania and Poland on the implementation of the Recommendations adopted before 2007. The Heads of Delegation pointed out the need for further work to clarify why there are difficulties in implementing some of the Recommendations and agreed to include the recently reported HELCOM Recommendations in the updated HELCOM Explorer.

HELCOM is currently working on reviewing recommendations in order to reveal those which require revision or might be withdrawn due to obsolete regulations. The reporting results will be utilized also to evaluate relevance of the recommendations adopted before 2007 to current technical and legal requirements.

### Action requested

The Meeting is invited to take note of the status of reporting and agree on the deadline when the reporting will be accomplished by countries which have not yet reported.

## Overview of reporting on HELCOM Recommendations

### Introduction

HOD 55-2018 Meeting agreed on the list of HELCOM Recommendations to be reported to support the BSAP update. The HODs further mandated the Secretariat to arrange for the reporting. The reporting was initiated in January-February 2019.

The Contracting Parties were invited to answer if each recommended action in the Recommendations were accomplished, not accomplished, on-going or not applicable. The countries were invited to provide justification (e.g. reference to relevant national legislation) for the actions that were reported accomplished. Paragraphs recommending joint regional actions were not included in the reporting. To ensure a harmonized interpretation of the recommended actions, the Secretariat sent clarifying questions and asked for additional information.

Full implementation of a Recommendation in this questionnaire means that all the recommended actions have been accomplished. It is good to note, however, that some of the actions can have a more significant impact for improving the state of the Baltic Sea than others but this was not differentiated in this analysis. Also, the joint actions included in Recommendations were not considered.

### Overview of reporting on HELCOM Recommendations under the Pressure Working Group

#### Recommendations adopted before 2007

In order to optimize the follow-up of the implementation of actions from the Recommendations adopted before 2007, Pressure Working Group evaluated them against recent legislation common for the EU member states and Russian Federation.

The actions which have been already integrated into the common legal requirements for the EU member states were suggested to be set aside of the current reporting, since they were considered as implemented. PRESSURE 10-2019 agreed on the actions from HELCOM Recommendations adopted before 2007 to be included into the reporting ([Outcome of PRESSURE 10-2019, Annex 2](#)).

Russian experts evaluated actions from Recommendations adopted before 2007 against the requirements of related national legislation. The analysis revealed that most of the provisions of the HELCOM Recommendations had been already included into national BREFs enacted since 1 January 2019. The exceptions were some specific requirements for sewage water discharges from the Iron Steel Industry (Recommendation 24-4) and HELCOM requirements beyond Stockholm Convention for elimination of PCBs and PCT (Recommendation 25-1).

Since PRESSURE 10-2019 decided that all provisions of the Recommendation 24-4 and some specific provisions of the Recommendation 25-1 would be included in the reporting, the list of reporting requirements for Russia is identical to the one for the EU member states.

The following Recommendations were included in the reporting, at least partly:

- [17-6](#) Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers
- [24-4](#) Reduction of Emissions and Discharges from the Iron Steel Industry
- [23-7](#) Reduction of discharges and emissions from the metal surface treatment
- [23-12](#) Reduction of Discharges and emissions from production of textiles
- [25-1](#) Elimination of PCBs and PCTs
- [16-4](#) Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry
- [6-4](#) Measures Aimed at the Reduction of Mercury Resulting from Dentistry
- [17-8](#) Reduction of Discharges from the Kraft Pulp Industry
- [17-9](#) Reduction of Discharges from the Sulphite Pulp Industry

- [17-10](#) Basic Principles for Realization of BAT and BEP in Food Industry
- [23-9](#) Restriction of atmospheric emissions and waste water discharges from hard coal cokeries
- [23-10](#) Reduction of discharges and emissions from production and formulation of pesticides
- [14-3](#) Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry
- [23-4](#) Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment

Estonia, Finland, Germany, Lithuania and Poland have reported on the implementation of these Recommendations, but the reporting is not yet completed by all these countries. The reporting by countries is included in Annex 1 and in more detail in the Excel attachment.

#### Implementation status

#### **[17-6](#) Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers**

Two out of five countries reported that the Recommended actions are implemented or not applicable, and three out of five countries reported that the implementation of the Recommendations is at least partly ongoing.

#### **[24-4](#) Reduction of Emissions and Discharges from the Iron Steel Industry**

One out of four countries reported that the Recommendations is fully implemented, and two countries reported that it is not applicable.

#### **[23-7](#) Reduction of discharges and emissions from the metal surface treatment**

One out of five countries reported that the Recommendation is fully implemented.

#### **[23-12](#) Reduction of Discharges and emissions from production of textiles**

One out of five countries reported that the Recommendation is fully implemented, and one reported that it is not applicable.

#### **[25-1](#) Elimination of PCBs and PCTs**

One out of five countries reported that the Recommendation is fully implemented.

#### **[16-4](#) Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry**

Four out of five countries reported that the Recommendation is implemented.

#### **[6-4](#) Measures Aimed at the Reduction of Mercury Resulting from Dentistry**

Two out of five countries have fully implemented the Recommendation.

#### **[17-8](#) Reduction of Discharges from the Kraft Pulp Industry**

Three out of five countries have implemented the Recommendation and one country reported that it is not applicable.

**17-9 Reduction of Discharges from the Sulphite Pulp Industry**

Three out of five countries have implemented the Recommendation and one country reported that it is not applicable.

**17-10 Basic Principles for Realization of BAT and BEP in Food Industry**

Three out of five countries reported that the recommended action is implemented with some reservations.

**23-9 Restriction of atmospheric emissions and waste water discharges from hard coal cookeries**

One out of four countries reported that the Recommendation is fully implemented, and two reported that it is not applicable.

**23-10 Reduction of discharges and emissions from production and formulation of pesticides**

One out of four countries reported that the Recommendation is fully implemented, and two reported that it is not applicable.

**14-3 Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry**

Four out of five countries reported that the recommended action is implemented.

**23-4 Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment**

None of the four countries reported that the Recommendation would be fully implemented.

## Annex 1. Implementation of HELCOM Recommendations under Pressure Working Group adopted before 2007

**17-6 Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
Load values (set by the Recommendation) should not be exceeded as annual mean values		Not applicable	On-going	Not applicable		Yes	On-going		
Air emissions resulting from the production of fertilizers should be treated by appropriate techniques (Table 1) and comply with the limit values set by the Recommendation		Not applicable	On-going	Yes		On-going	On-going		

**24-4 Reduction of Emissions and Discharges from the Iron Steel Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
discharges should be avoided by using such operations (e.g. dry gas cleaning techniques) which cause no discharges to water;		Not applicable	On-going			Not applicable	Yes		
process water, polluted cooling water and polluted stormwater should be treated separately from unpolluted cooling water at each plant;		Not applicable	On-going			Not applicable	Yes		
installation of closed water systems should be developed for process water and polluted cooling water in order to reach a circulation rate of at least 95%;		Not applicable	On-going			Not applicable	Yes		
production processes, utilization of by-products, waste- and stormwater treatment technology should be developed in order to minimize discharges (e.g. slag granulation by process water);		Not applicable	On-going			Not applicable	Yes		
internal and external measures should be taken to minimize accidental discharges (e.g. installation of sufficient storage capacity for untreated waste waters);		Not applicable	On-going			Not applicable	Yes		
sludges and other solid waste should be utilized or when not possible disposed of in a manner causing minimal environmental hazard (e.g. preferably by treating and entering the sludges to the blast furnace, sintering plant or electric arc furnace).		Not applicable	On-going			Not applicable	Yes		
Waste water discharges comply with the requirements set by the Recommendation		Not applicable	On-going			Not applicable	Yes		
Air emissions comply with the requirements set by the Recommendation		Not applicable	On-going			Not applicable	Yes		

**23-7 Reduction of discharges and emissions from the metal surface treatment**

<b>Recommended action</b>	<b>DK</b>	<b>EE</b>	<b>FI</b>	<b>DE</b>	<b>LV</b>	<b>LT</b>	<b>PL</b>	<b>RU</b>	<b>SE</b>
If technically possible, substitution of hazardous substances (e.g. cyanide, cadmium, mercury, EDTA and similar sequestering agents, nonylphenol-ethoxylates, chlorinated organics) by substances which are readily biodegradable, non-bioaccumulating and non-mutagenic and have a low toxicity;		On-going	On-going	Yes		Yes	On-going		
Substitution of EDTA in degreasing baths, stripping baths and chemical nickel plating baths. Possible substitutes include e.g. citric acid, tartaric acid and gluconic acid;		On-going	On-going	Yes		Yes	On-going		
Substitution of processes generating noxious substances wherever possible (e.g. cyanide oxidation with hypochlorite);		On-going	On-going	Yes		Yes	On-going		
Treatment of process baths using suitable processes in order to have the longest possible service life. Such processes include, e.g. membrane filtration, ion exchange, electrolysis, thermal processes and evaporation;		On-going	On-going	Yes		Yes	On-going		
Retention of bath ingredients by suitable means, such as transporting the goods in such a way that drag-out is minimised; splash guards or optimised bath composition;		On-going	On-going	Yes		Yes	On-going		
Multiple use of counter-current rinse waters (at least three rinsing steps should be applied). Suitable techniques to keep more than 90% of the drag-out in a small volume for recovery/recycling are to be applied.		On-going	On-going	Yes		Yes	On-going		
Separation of suitable non-ferrous metal waste water streams to carry out internal recycling (e.g. by electrolysis) or external recovery (e.g. by non-ferrous metal industry);		On-going	On-going	Yes		Yes	On-going		
Recovery of EDTA from chemical copper plating baths (e.g. by precipitation as H4EDTA) and their rinse baths (e.g. by precipitation after a concentration step, e.g. by anion exchange),		On-going	On-going	Yes		Yes	On-going		
Waste water discharges comply with the requirements for the reduction set by the Recommendation		Yes	On-going	Yes		On-going	On-going		
Air emissions comply with the requirements for the reduction set by the Recommendation		Yes	On-going	Yes		Yes	On-going		

**23-12 Reduction of Discharges and emissions from production of textiles**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
limit values (set by the Recommendation) should not be exceeded for discharges into surface water		Not applicable	On-going	Yes		On-going	On-going		
limit values (set by the Recommendation) should not be exceeded for emissions into the atmosphere out of the production of textiles		Not applicable	On-going	Yes		Yes	On-going		

**25-1 Elimination of PCBs and PCTs**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
the new use of substitutes for PCBs and PCTs considered as being equally or more hazardous should be banned and those already in use should be substituted as soon as possible with less hazardous or non-hazardous substances;		Yes	Yes	Yes		Yes	Yes		
undertake all possible measures to avoid fires, accidents and abnormal operation conditions at sites where PCB containing equipment with a weight more than 1 kg is still in use or stored, as well as leakage and spillage from PCB containing equipment still in use or stored		Yes	Yes	On-going		On-going	Yes		
take appropriate measures to cease emissions from “uncontrolled applications ” e.g. controlled collection, handling and disposal which are for instance, products with a low (less than 0,005%) concentration of PCBs (e.g. mineral oil contaminated with PCB), which have been marketed in large quantities, and products with a small volume of pure PCBs (e.g. capacitors in strip light fittings, small capacitors in household appliances) and thus amount to high total quantities,		Yes	No information	On-going		On-going	Yes		
if it is suspected or proved during renovation or demolition of any building that its components contain PCBs or PCTs, they should be treated as if they contain PCBs or PCTs and should be disposed off in an environmentally sound manner,		Yes/On-going	Yes	On-going		Yes	Yes		

**16-4 Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
take measures to reduce the emissions from the pulp and paper industry, so that the emissions of nitrogen oxides, NO <sub>x</sub> (nitrogen oxide + nitrogen dioxide), as a yearly average for each Contracting Party's emissions from recovery boilers and lime kilns do not exceed the value set by the Recommendation. (limit values set by HELCOM Recommendation stricter than BAT-AEL in BATC PP).		Yes	On-going	Yes		Yes	Yes		

**6-4 Measures Aimed at the Reduction of Mercury Resulting from Dentistry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
collection of waste containing mercury from dental clinics, laboratories and surgeries should be established		Yes	Yes	Yes/On-going		Yes	On-going		
elaborating new mercury-free materials for tooth fillings should be encouraged and the use of mercury containing materials for this purpose should, whenever possible, be abandoned,		On-going	Yes	On-going		Yes	On-going		

**17-8 Reduction of Discharges from the Kraft Pulp Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
to take measures to reduce discharges from the kraft pulp industry so that the annual average discharge limit values (set by the Recommendation) are not exceeded. (limit values set by HELCOM Recommendation stricter than BAT-AEL in BATC PP)		Yes	On-going	Yes		Not applicable	Yes		

**17-9 Reduction of Discharges from the Sulphite Pulp Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
to take measures to reduce discharges from the sulphite pulp industry so that the annual average discharge limit values (set by the Recommendation) are not exceeded. (limit values set by HELCOM Recommendation stricter than BAT-AEL in BATC PP)		Yes	On-going	Yes		Not applicable	Yes		

**17-10 Basic Principles for Realization of BAT and BEP in Food Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
plants of food industry which discharge more than 25 m <sup>3</sup> /d into water bodies, or to municipal waste water treatment plant without biological treatment including phosphorus removal, should meet the following requirements (2-hour or 24-hour values): COD 250 mg/l BOD <sub>5</sub> (BOD <sub>7</sub> ) 25 mg/l (30 mg/l) tot-P 2 mg/l *) NH <sub>4</sub> -N 10 mg/l *) **)		Yes/On-going	On-going	In general: yes		On-going	Yes		

**23-9 Restriction of atmospheric emissions and waste water discharges from hard coal cokeries**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
to take measures for hard coal cokeries to meet requirements for the reduction of waste water discharges, including limit values set by the Recommendation		Not applicable	On-going			Not applicable	Yes		
to take measures for hard coal cokeries to meet requirements for the reduction of emissions to the air, including limit values set by the Recommendation		Not applicable	On-going			Not applicable	Yes		

**23-10 Reduction of discharges and emissions from production and formulation of pesticides**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
to take measures for production and formulation of pesticides to meet requirements for the reduction of waste water discharges, including limit values set by the Recommendation		Not applicable	On-going	yes		Not applicable			
to take measures for production and formulation of pesticides to meet requirements for the reduction of emissions to the air, including limit values set by the Recommendation		Not applicable	On-going	Yes		Not applicable			

**14-3 Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry**

Recommended action	DK	EE	FI	DE	LV	LT	PL	RU	SE
The NO <sub>x</sub> emissions may, by catalytic or equally efficient process, not exceed 2.5 kg per produced tonne glass, calculated as NO <sub>2</sub> , if the capacity of the production unit is more than 20 000 tonne/a,		Yes	On-going	Yes		Yes	Yes		

**23-4 Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment**

<b>Recommended action</b>	<b>DK</b>	<b>EE</b>	<b>FI</b>	<b>DE</b>	<b>LV</b>	<b>LT</b>	<b>PL</b>	<b>RU</b>	<b>SE</b>
mercury-containing electrical equipment should be substituted by mercury-free-equipment;		Yes		No		No	On-going		
development of mercury-free alternatives should be supported by ECO-labelling		On-going		No		No	On-going		