



Document title	Joint position of environmental NGOs on internal loading in the Baltic Sea
Code	8-6
Category	CMNT
Agenda Item	8 – Pollution Load Compilation
Submission date	4.10.2016
Submitted by	Coalition Clean Baltic and WWF Baltic Ecoregion Programme
Reference	PRESSURE 5-2016, doc. 1-2; Outcome of HELCOM HOD 50-2016

Background

Environmental Ministers and High-Level representatives from HELCOM Contracting Parties at their meeting in Copenhagen in 2013, inter alia

- agreed to fully implement the 2007 Baltic Sea Action Plan by 2021 and to step up efforts for further strengthened implementation of the BSAP
- acknowledged that environmental deterioration such as oxygen depletion is increasingly affecting marine life by e.g. accelerating eutrophication through increasing the internal loading;
- supported development of environmentally sound approaches to remove the nutrients before they enter inland waters and the sea, and to address the internal loading, in coastal areas and semi-enclosed lagoons, as well as in the open sea;

On February 12, 2015 the seminar [“Sea-based measures to reduce the effects of eutrophication”](#) was arranged by Sweden Ministry of Environment, Baltic Sea Centre and Swedish Agency for Marine and Water Management with the aim to review nine pilot projects and in light of these, to discuss opportunities and challenges associated with sea-based measures to reduce internal loading.

Despite no formal discussion has been held on internal load within HELCOM since the seminar, HELCOM HOD 50-2016 requested to include issues related to the internal load into the agenda of PRESSURE 5-2016.

Baltic environmental NGOs, represented by Coalition Clean Baltic network consisting of 18 grass-root organizations from 11 countries in the Baltic Sea catchment and the WWF Baltic Ecoregion Programme would like to forward for consideration of HELCOM Contracting Parties the attached joint statement regarding the issue of internal load in the Baltic Sea. Our main points on this matter are as follows:

1. Internal load is not a cause of eutrophication, but it is a consequence of numerous years of mismanagement of nutrient inputs from the Baltic Sea catchment.
2. There is no evidence that the Contracting Parties have taken and implemented all relevant measures to reduce eutrophication, as agreed in HELCOM BSAP – especially from land-based sources, so there is no sense and need to change the path and turn to sea-based measures.
3. Although positive effects of reduced land-based input could be seen in some coastal areas, there is still a need for further improvement, especially addressing diffuse runoff and losses from agriculture.
4. Proposed sea-based measures to address internal loading have not proven to be (a) effective, (b) cost-efficient, (c) polluter-specific and (d) harmless at a larger scale and in a longer-term perspective.
5. Very few end-of-pipe solutions have appeared to be more efficient than source reduction measures, hence the latter should be further promoted and supported.
6. External nutrient reduction before entering the sea is the only truly effective long-term strategy to combat eutrophication.

Action requested

The Meeting is invited to consider the attached joint position of environmental NGOs on internal loading in the Baltic Sea in the course of the discussions on the matter.



04 October 2016, Uppsala/Stockholm

Joint position of environmental NGOs on internal loading in the Baltic Sea

Environmental Ministers and High-Level representatives from HELCOM Contracting Parties at their meeting in Copenhagen in [2013](#), *inter alia*

- agreed to fully implement the 2007 Baltic Sea Action Plan by 2021 and to step up efforts for further strengthened implementation of the BSAP
- acknowledged that environmental deterioration such as oxygen depletion is increasingly affecting marine life by e.g. accelerating eutrophication through increasing the internal loading;
- supported development of environmentally sound approaches to remove the nutrients before they enter inland waters and the sea, and to address the internal loading, in coastal areas and semi-enclosed lagoons, as well as in the open sea;

The issue of internal loading was brought up to HELCOM's agenda with the assumption that most of the reductions on land (both at point and diffuse sources) have been already achieved, e.g. through accomplishment of efficient sewage treatment and excess usage of fertilizer and manure in agriculture being gradually eliminated. Hence, according to the proponents, very limited, costly and constantly diminishing reductions can be achieved using conventional land-based approach, and thus interest on innovative sea-based measures that should be investigated and applied have gained traction.

NGOs strongly believe that the real reason for promoting alternative, sea-based solutions to the eutrophication problem might be tightly connected with observed poor implementation of [BSAP MAI/CART commitments](#) and lack of will to enforce stricter HELCOM requirements at national level in comparison to EU law, by some Contracting Parties/EU Member States. This recently became even more evident with several Contracting Parties questioning the MAI/CART scheme that was jointly agreed in 2007 and reviewed in 2013. Another possible reason could be the need to develop and implement 'novel' measures, not yet being used in current EU policies e.g. WFD or Nitrates Directive process, in order to be able to feed those into Programmes of Measures under the MSFD.

Meanwhile, cost-efficiency of already applied measures in terms of delivering good environmental status for the Baltic Sea with regards to eutrophication has been very poorly assessed – both at national or HELCOM level. So far only potential economic benefits stemming from implementation of the HELCOM BSAP measures have been evaluated. On the contrary the EU financial support mechanisms in many cases, e.g. in agriculture, cause continued high inputs of nutrients with minor consideration of environmental objectives for the marine environment.

Our understanding is strongly supported by the findings of the recent EU Court of Auditors' report "Combating eutrophication in the Baltic Sea: further and more effective action needed" ([2016](#)), echoed by the [EU Council Conclusions](#) on the ECA's Report, which reflected the following:

- within 2007-2013 the EU contribution to waste water collection and treatment projects in the BSR was 4.6 billion euro from [ERDF/CF](#), while rural development measures, including water protection measures amounted to 9.9 billion euro from [EAFRD](#).
- Member States' plans for achieving HELCOM nutrient reduction targets are lacking ambition as they do not go beyond statutory EU requirements, that do not suite the Baltic-specific needs; those plans are often delayed and vary in level of enforcement, as well as based on insufficient information and lack progress monitoring; moreover HELCOM requirements on sewage treatment and agro-environment measures are not in full incorporated into national legislation in most of the Contracting Parties.
- None of the Baltic EU MS have reached good ecological status of their surface and ground waters by 2015, as originally set under the WFD and hence reaching in time Good Environmental Status under the

EU MSFD is also very questionable, again partly due to lacking coordination with the objectives and activities of the existing regional sea conventions (HELCOM)

On February 12, 2015 the seminar "[Sea-based measures to reduce the effects of eutrophication](#)" was arranged by Sweden's Ministry of Environment, Baltic Sea Centre and Swedish Agency for Marine and Water Management with the aim to review nine pilot projects and in light of these, to discuss opportunities and challenges associated with sea-based measures to reduce internal loading. During the seminar it was pointed out by many participants that the Baltic Sea ecosystem is fragile and there is a lack of knowledge about how the flora and fauna will react to these types of substantial human manipulations. Also the risks and uncertainties increase for the ecosystem when the measures applied go from small scale at the coastal level to large scale on the open seas. However, the concluding panel agreed that some offshore activities in the future might be complementary to current land-based measures to speed up the recovery of the Baltic Sea.

Putting it candidly, the internal nutrient load in the Baltic Sea means a recirculation of "old sins", hence it is a consequence and not a cause of eutrophication. Despite pilot attempts, scientific knowledge is still lacking and vast uncertainty remains about the effectiveness of measures to reduce the internal load, especially for large-scale Baltic Sea wide application. Furthermore, the total costs of the proposed measures have not been calculated, neither any estimates of effectiveness and environmental consequences of proposed measures on the open Baltic Sea ecosystem have been produced. As currently the anoxic "dead" bottom zones extend to several national EEZs and cover an area comparable to twice the size of Denmark, the question remains who should pay for the needed EIA and investments for technical solutions addressing open sea eutrophication.

Despite no formal discussion has been held on internal load within HELCOM since the seminar, HELCOM HOD 50-2016 requested to include issues on internal load into the agenda of PRESSURE 5-2016.

Based on the above and to express the joint Baltic environmental NGOs position on the discussion, we would like to draw the attention to several important points on this issue to reflect upon:

1. **Internal load is not a cause of eutrophication, but it is a consequence of numerous years of mismanagement of nutrient inputs from the Baltic Sea catchment.** According to the [Baltic Eye's policy brief](#) "The internal phosphorus load – recycles old sins" (October 2016), the accumulated load of nutrients in the catchment is about 20 times higher than estimated load bound in bottom sediments. Hence, nutrient sources in the catchment will still need to be addressed as being the root cause of phosphorus accumulation on the sea floor.
2. **There is no evidence that the Contracting Parties have taken and implemented all relevant measures to reduce eutrophication, as agreed in HELCOM BSAP – especially from land-based sources** (stricter sewage treatment and fertiliser application, nutrient recycling, etc.) and as agreed in Article 6 and [Annex III](#) of the Helsinki Convention (1992).
3. **Although positive effects of reduced land-based input could be seen in some coastal areas, there is still a need for further improvement.** Measures for continued reduced supply and a more resource-efficient use of nitrogen and phosphorus have effect and are of great importance and should be a priority, not least in order to reduce eutrophication in lakes, rivers and coastal waters in the Baltic Sea Region, in meeting the WFD and MSFD requirements.
4. **Proposed sea-based measures to address internal loading have not proven to be (a) effective, (b) cost-efficient, (c) polluter-specific and (d) harmless in application at a larger scale and in longer-term perspective,** hence violating two fundamental principles of the Helsinki Convention, namely precautionary and polluter-pays principle.
5. **Very few end-of-pipe solutions have appeared to be more efficient than source reduction measures.** Without curbing nutrient pollution sources we will not be able to cease eutrophication cause (point and diffuse inputs) and hence tackle the consequences at sea (anoxic bottoms, internal loading).
6. **External nutrient reduction before entering the sea is the only truly effective long-term strategy to combat eutrophication.** Therefore, we call upon the Governments of the Contracting Parties to follow their commitments under the HELCOM BSAP and demonstrate it with real actions, i.a. finally endorsing Country Allocated Reduction Targets by all the Contracting Parties and implementing nutrient reduction measures stipulated by the Helsinki Convention (1992) and its Annexes.