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<b>Document title</b>	Comments on assessment of implementation of Recommendations adopted before 2007
<b>Code</b>	3-1-Add.1
<b>Category</b>	CMNT
<b>Agenda Item</b>	3 – Organization of work to update the Baltic Sea Action Plan, including the revision of HELCOM Recommendations
<b>Submission date</b>	24.9.2018
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<b>Reference</b>	Document 3-1, Annex 5

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### Background

The latest assessment of implementation of HELCOM Recommendations adopted before 2007 was made for LAND 16-2011. The LAND group pointed out that most of the recommendations adopted before 2007 concerned industrial emissions, which had already been addressed in various EU directives and included into BREFs. The Recommendation 25/2, an umbrella Recommendation on effective use of BAT, contains a recommendation to use BAT regulating emission and discharge levels for many industrial sectors. At that LAND group meeting, some countries stressed that the update of this Recommendation should be more efficient way to deal with minimizing of negative impact from land-based industrial sources than revision of old industrial Recommendations.

This document contains background information on the status of implementation of HELCOM Recommendations and potential for revision of outdated requirements for industrial activities taking into account availability of BAT, as contained in:

- Table 1. Summary information on HELCOM Recommendations and corresponding EU requirements.
- Table 2. Status of implementation of Recommendations evaluated in 2011.
- Table 3. Reporting periods and revision of HELCOM Recommendations adopted before 2007.
- Table 4. Status of reporting on implementation of Recommendations as for 13 March 2007 (latest reporting round, 2008 - marked in bold).











There has not been any reporting and assessment of implementation of these recommendations after 2011. Only Recommendations adopted after 2007 were assessed for the background document for the MD2013.

### Action requested






The Meeting is invited to:


- take note of the information on the state of reporting and assessment of implementation of HELCOM Recommendations adopted before 2007;
- take note of information on the state of related EU regulations;
- decide on the Recommendations to be reported on and agree on reporting procedure.

**Table 1. Summary information on HELCOM Recommendations and corresponding EU requirements (state at 2011).**

NN	Recommendation title	Corresponding IPPC/IED Reference document				
			<i>adopted</i>	<i>revision</i>	<i>review</i>	
<i>Recommendations on Industrial Point Sources (including waste management, combustion and incineration)</i>						
14/3	Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry		<a href="#">Glass Manufacturing Industry</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D2 (07.2009)</a>	
16/4	Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry		<a href="#">Pulp and Paper Industry</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D1 (04.2010)</a>	
17/8	Reduction of Discharges from the Kraft Pulp Industry		<a href="#">Pulp and Paper Industry</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D1 (04.2010)</a>	
17/9	Reduction of Discharges from the Sulphite Pulp Industry		<a href="#">Pulp and Paper Industry</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D1 (04.2010)</a>	
16/7	Basic Principles in Waste Water Management in the Leather Industry		<a href="#">Tanning of Hides and Skins</a>	<a href="#">BREF (02.2003)</a>	<a href="#">D1 (02.2009)</a>	
17/6	Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers		<a href="#">Large Volume Inorganic Chemicals – Ammonia, Acids and Fertilisers Industries</a>	<a href="#">BREF (08.2007)</a>	-	
			<a href="#">Large Volume Inorganic Chemicals – Solids and Others Industry</a>	<a href="#">BREF (08.2007)</a>		
17/10	Basic Principles for Realization of BAT and BEP in Food Industry		<a href="#">Food, Drink and Milk Industries</a>	<a href="#">BREF (08.2006)</a>		
23/6	Reduction of emissions and discharges of mercury from chloralkali industry		<a href="#">Chlor-alkali Manufacturing Industry</a>	<a href="#">BREF (12.2001)</a>		
23/7	Reduction of discharges and emissions from the metal surface treatment		<a href="#">Surface Treatment of Metals and Plastics</a>	<a href="#">BREF (08.2006)</a>		


			<a href="#">Surface Treatment Using Organic Solvents</a>	<a href="#">BREF (08.2007)</a>		
23/8	Reduction of discharges from oil refineries		<a href="#">Mineral Oil and Gas Refineries</a>	<a href="#">BREF (02.2003)</a>	<a href="#">D1 (07.2010)</a>	
23/9	Restriction of atmospheric emissions and waste water discharges from hard coal cokeries		<a href="#">Iron and Steel Production</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D2 (07.2009)</a>	
23/10	Reduction of discharges and emissions from production and formulation of pesticides		<a href="#">Manufacture of Organic Fine Chemicals</a>	<a href="#">BREF (08.2006)</a>		
23/11	Requirements for discharging of waste water from the chemical industry		<a href="#">Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector</a>	<a href="#">BREF (02.2003)</a>	<a href="#">D1 (10.2009)</a>	
			<a href="#">Large Volume Inorganic Chemicals – Ammonia, Acids and Fertilisers Industries</a>	<a href="#">BREF (08.2007)</a>		
			<a href="#">Large Volume Organic Chemical Industry</a>	<a href="#">BREF (02.2003)</a>		
			<a href="#">Manufacture of Organic Fine Chemicals</a>	<a href="#">BREF (08.2006)</a>		
			<a href="#">Production of Polymers</a>	<a href="#">BREF (08.2007)</a>		
			<a href="#">Production of Speciality Inorganic Chemicals</a>	<a href="#">BREF (08.2007)</a>		
23/12	Reduction of Discharges and emissions from production of textiles		<a href="#">Textiles Industry</a>	<a href="#">BREF (07.2003)</a>		2012
4/4	Reduction of Emissions and Discharges from the Iron Steel Industry		<a href="#">Iron and Steel Production</a>	<a href="#">BREF (12.2001)</a>	<a href="#">D2 (07.2009)</a>	

			<a href="#">Ferrous Metals Processing Industry</a>	<a href="#">BREF (12.2001)</a>		started
			<a href="#">Smitheries and Foundries Industry</a>	<a href="#">BREF (05.2005)</a>		2012+
24/5	Proper handling of Waste/Landfilling <b>superseded by HELCOM Recommendation 31E/4</b>		<a href="#">Waste Treatments Industries</a>	<a href="#">BREF (08.2006)</a>		2012+
27/1	Limitation of emissions into atmosphere and discharges into water from incineration of waste		<a href="#">Waste Incineration</a>	<a href="#">BREF (08.2006)</a>		
28E/4	Amendments to Annex III "Criteria and Measures Concerning the Prevention of Pollution from Land-Based Sources" of the 1992 Helsinki Convention		<a href="#">Intensive Rearing of Poultry and Pigs</a>	<a href="#">BREF (07.2003)</a>	<a href="#">D1 (03.2011)</a>	
25/2	Reduction of Emissions and Discharges from Industry by effective use of BAT		<ul style="list-style-type: none"> <li>- Current performance requirements and examples of BAT do not reflect recent developments, e.g. availability of new BREFs for specific sectors of industry.</li> <li>- to be revised as agreed by LAND 15/2010</li> </ul>			
29/1	Reduction of emissions from crematoria					

 **BREF**, indicates that a **document has been formally adopted** by the European Commission.



Indicates that work has started but a draft is not yet available.

 **D1/D2/D3**, indicates the latest draft which is available.



Indicates work is planned to commence in the year shown but has not yet started.

**Table 2. Status of implementation of Recommendations evaluated in 2011.**

NN	Recommendation title	State-of-play, need for update
<i>Recommendations on Municipal Waste Water Treatment and Collection of Storm waters</i>		
13/2	Industrial Connections and Point Sources other than Household Connected to Municipal Sewerage Systems	
23/5	Reduction of discharges from urban areas by the proper management of storm water systems	
<i>Recommendations on diffuse sources (agriculture, forestry and fish-farming)</i>		
18/4	Managing Wetlands and Freshwater Ecosystems for Retention of Nutrients	The ARTWEI Project to provide inputs
25/3	Reduction of Nutrients and other Pollutants leaching from forestry land	
25/4	Measures aimed at the reduction of discharges from Water and Marine Fish Farming	Recommendation 25/4 should have been reconsidered after new requirements on nutrient discharges are implemented by 2005
<i>Recommendations on production control measures</i>		
6/4	Recommendation Concerning Measures Aimed at the Reduction of Mercury Resulting from Dentistry	- use of amalgam in dentistry is still an issue in some CPs.
23/4	Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment	- partly implemented by the Contracting Parties.
20/2	Approval of pesticides ("Plant protection products") for use in the catchment area of the Baltic Sea	- fully implemented by the EU-10 countries, but implementation by the new Member States and Russia shall be re-examined.
20/4	Antifouling paints containing organotin compounds	fully implemented by the EU-10 countries, but implementation by the new Member States and Russia shall be re-examined.
25/1	Elimination of PCBs and PCTs	fully implemented by the EU-10 countries, but implementation by the new Member States and Russia shall be re-examined.
31E/3	Cadmium in fertilisers	Should be reviewed in 2013
<i>Recommendation in the transport field</i>		
9/4	Recommendation Concerning Reduction of Emissions of Lead from Combustion of Leaded Gasoline	Recommendation 9/4 is fully implemented by all Contracting Parties since prohibition of production and distribution of leaded gasoline in Russia by 1 July 2003.
17/1	Reduction of Emissions from Transport Sector Affecting the Baltic Sea	

**Table 3. Reporting periods and revision of HELCOM Recommendations adopted before 2007.**

#	Title	Adoption	Implementation	Reporting started	Reporting period	Next round
6/4	Recommendation Concerning Measures Aimed at the Reduction of Mercury Resulting from Dentistry	13.03.1985	1986 1988	13.03.86	-	-
9/4	Recommendation Concerning Reduction of Emissions of Lead from Combustion of Leaded Gasoline	15.02.1988		15.02.89	5 yrs	2008
13/2	Industrial Connections and Point Sources other than Household Connected to Municipal Sewerage Systems	05.02.1992		1994	3 yrs	2009
14/3	Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry	03.02.1993	1994 1998	1997	3 yrs	2009 (?)
16/4	Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry	15.03.1995		1997	3 yrs	2009
16/7	Basic Principles in Waste Water Management in the Leather Industry	15.03.1995	01.01.1996 01.01.2000	1997	3 yrs	2009
17/1	Reduction of Emissions from Transport Sector Affecting the Baltic Sea	13.03.1996		2000	3 yrs	2009
17/6	Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers	12.03.1996	01.01.1998 01.01.2002	2003	3 yrs	2009
17/8	Reduction of Discharges from the Kraft Pulp Industry	13.03.1996	1997 – CF 2000 – CF	2000	3 yrs	2009
17/9	Reduction of Discharges from the Sulphite Pulp Industry	13.03.1996	1997 – CF	2000	3 yrs	2009

#	Title	Adoption	Implementation	Reporting started	Reporting period	Next round
17/10	Basic Principles for Realization of BAT and BEP in Food Industry	13.03.1996	01.01.1998 01.01.2000 (2005)	2000	3 yrs	2009
18/4	Managing Wetlands and Freshwater Ecosystems for Retention of Nutrients	11.03.1997		1999	3 yrs	2008
20/2	Approval of pesticides ("Plant protection products") for use in the catchment area of the Baltic Sea	23.03.1999	2003 – criteria	2003	3 yrs	2008
20/4	Antifouling paints containing organotin compounds	23.03.1999		2000	3 yrs	2009
21/1	Amendments to Annex III "Criteria and measures concerning the prevention of pollution from land-based sources" of the 1992 Helsinki Convention	20.03.2000	2000/2002 2002/2011			
23/4	Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment	06.03.2002				
23/5	Reduction of discharges from urban areas by the proper management of storm water systems	06.03.2002	2002, A2-A5 - new	2006 - data 2004	3 yrs	2009
23/6	Reduction of emissions and discharges of mercury from chloralkali industry	06.03.2002		2006	3 yrs	2009
23/7	Reduction of discharges and emissions from the metal surface treatment	06.03.2002		2006	3 yrs	2009
23/8	Reduction of discharges from oil refineries	06.03.2002		2005	3 yrs	2008
23/9	Restriction of atmospheric emissions and waste water discharges from hard coal cookerries	06.03.2002		2003	3 yrs	2009

#	Title	Adoption	Implementation	Reporting started	Reporting period	Next round
23/10	Reduction of discharges and emissions from production and formulation of pesticides	06.03.2002		2006	3 yrs	2009
23/11	Requirements for discharging of waste water from the chemical industry	06.03.2002	01.01.2003 01.01.2005	2006	3 yrs	2009
23/12	Reduction of Discharges and emissions from production of textiles	06.03.2002	2002	2006	3 yrs	2009
24/4	Reduction of Emissions and Discharges from the Iron Steel Industry	25.06.2003		2006	3 yrs	2009
25/1	Elimination of PCBs and PCTs	02.03.2004	2010/2015 2015/2020	2006	3 yrs	2009
25/2	Reduction of Emissions and Discharges from Industry by effective use of BAT	02.03.2004		2006	3 yrs	2009
25/3	Reduction of Nutrients and other Pollutants leaching from forestry land	02.03.2004		2006	6 yrs	2012
25/4	Measures aimed at the reduction of discharges from Water and Marine Fish Farming	02.03.2004		2005	HELCOM reporting	
27/1	Limitation of emissions into atmosphere and discharges into water from incineration of waste	08.03.2006				




**Table 4. Status of reporting on implementation of Recommendations as for 13 March 2007 (latest reporting round, 2008 - marked in bold)**

#	Title	Lead Country	Contracting Parties								
			DK	EE	FI	DE	LV	LT	PL	RU	SE
6/4	Recommendation Concerning Measures Aimed at the Reduction of Mercury Resulting from Dentistry										
<b>9/4</b>	<b>Recommendation Concerning Reduction of Emissions of Lead from Combustion of Leaded Gasoline</b>										
13/2	Industrial Connections and Point Sources other than Household Connected to Municipal Sewerage Systems										
14/3	Limitation of Emissions to the Atmosphere and Discharges into Water from Glass Industry	DE	+	+	+	+	+	+	+	+	+
16/4	Reduction of Emissions into the Atmosphere from the Pulp and Paper Industry	SE			+			+	+	+	
16/7	Basic Principles in Waste Water Management in the Leather Industry	PL	+	+	+	+	+	+	+	+	
17/1	Reduction of Emissions from Transport Sector Affecting the Baltic Sea	DE									
17/6	Reduction of Pollution from Discharges into Water, Emissions into the Atmosphere and Phosphogypsum out of the Production of Fertilizers	DE	+	+	+	+		+	+	+	+
17/8	Reduction of Discharges from the Kraft Pulp Industry	SE			+			+	+	+	

#	Title	Lead Country	Contracting Parties									
			DK	EE	FI	DE	LV	LT	PL	RU	SE	
17/9	Reduction of Discharges from the Sulphite Pulp Industry	SE			+				+	+	+	
17/10	Basic Principles for Realization of BAT and BEP in Food Industry	LT							+			
<b>18/4</b>	<b>Managing Wetlands and Freshwater Ecosystems for Retention of Nutrients</b>											
<b>20/2</b>	<b>Approval of pesticides ("Plant protection products") for use in the catchment area of the Baltic Sea</b>	<b>DK</b>										
20/4	Antifouling paints containing organotin compounds	DE									+	
21/1	Amendments to Annex III "Criteria and measures concerning the prevention of pollution from land-based sources" of the 1992 Helsinki Convention											
23/4	Measures aimed at the reduction of mercury pollution resulting from light sources and electrical equipment	PL								+	+	
23/5	Reduction of discharges from urban areas by the proper management of storm water systems	SE										
23/6	Reduction of emissions and discharges of mercury from chloralkali industry											
23/7	Reduction of discharges and emissions from the metal surface treatment	RU	+	+	+	+	+	+	+	+	+	+
<b>23/8</b>	<b>Reduction of discharges from oil refineries</b>	<b>FI</b>										

#	Title	Lead Country	Contracting Parties								
			DK	EE	FI	DE	LV	LT	PL	RU	SE
23/9	Restriction of atmospheric emissions and waste water discharges from hard coal cokeries	FI	+	+	+	+			+		+
23/10	Reduction of discharges and emissions from production and formulation of pesticides	DE	+	+	+	+			+		+
23/11	Requirements for discharging of waste water from the chemical industry	DE	+	+	+	+	+	+	+	+	+
23/12	Reduction of Discharges and emissions from production of textiles	DE	+	+	+	+	+	+	+	+	+
24/4	Reduction of Emissions and Discharges from the Iron Steel Industry	FI		+	+	+	+		+	+	+
25/1	Elimintaion of PCBs aND PCTs	DK		+	+	+	+		+		+
25/2	Reduction of Emissions and Discharges from Industry by effective use of BAT										
25/3	Reduction of Nutrients and other Pollutants leaching from forestry land										
25/4	Measures aimed at the reduction of discharges from Water and Marine Fish Farming										
27/1	Limitation of emissions into atmosphere and discharges into water from incineration of waste										

 The color indicates Recommendations which might be covered by requirements of the Minamata convention.