

6 March 2018

## Statement of the Baltic Sea Farmers' Forum on Environment (BFFE) on the draft Declaration of the 2018 HELCOM Ministerial Meeting and on Baltic Sea Action Plan

On behalf of the around 2 million farmers around the Baltic Sea, BFFE appreciates being invited to provide a statement in the HELCOM Ministerial Meeting.

The draft Ministerial Declaration contains many topics with remarkable importance to reach Good Environmental Status (GES) for the Baltic Sea. It is important that the Baltic Sea is seen as a whole, and that the interactions between a vast array of stressors are recognized. In this context, we mainly focus on issues directly related to agriculture. However, we would like to emphasize that other issues are equally important to be included in the Declaration.

BFFE sees that the "State of the Baltic Sea" report is useful because it provides basis to assess, whether the goals of the BSAP have been achieved. We support that the draft is finalized and the next holistic assessment will be prepared in 2023/2024. However, we want to emphasize the importance of real measurements providing data for the models and continuous development of them.

BFFE agrees that GES for the Baltic Sea is unlikely to be reached by 2021, although many efforts have been made. Agriculture is often mentioned as a sector that needs to do more. We want to remind that the agricultural sector has already implemented many measures to reduce nutrient load, and we will continue doing so on the voluntary basis. We also realize that the pressure will increase, due to the climate change. Agriculture is heavily regulated by EU and national legislation, and there are not needed more obligatory measures but financial and knowledge support to implement measures.

### *Cooperation needed to reduce eutrophication (Items 23, 24)*

Farmers cultivating the land in the catchment of the Baltic Sea welcome an increased cooperation between HELCOM and the agricultural sector. This has been wanted for many years. Many fruitful partnerships have already taken place, but they have mainly been limited to individual projects. It is time to broaden collaboration and involve more farmers. Every day, thousands of farmers use a vast array of measures to reach the country allocation targets for nutrients, while ensuring food safety and security. This work is essential, an approach, based on inclusion of and cooperation with farmers, is necessary.

As farmers, we have already been invited to increase cooperation within the implementation of the EU Water Framework Directive (WFD). In the Common Implementation Strategy (CIS) guidelines to

the EU member states it is stated that increased involvement by people leads to more measures being done. Environmental measures to protect lakes and streams also protect the Baltic Sea. The effort of creating local involvement in the WFD differs among the Baltic Sea states. Some states have many new local dialogue groups and have deployed a model of catchments officers, whereas other countries have restricted local involvement to the minimum of the public consultation, stated by the WFD. However, there is an emerging curiosity of the potential of local involvement, and large EU funded LIFE and Interreg projects are ongoing to explore the best ways of co-governance.

We propose that the efforts to enhance cooperation within the implementation of the WFD, when possible, should be attached to the ministers' decision and utilized when updating the Baltic Sea Action Plan (BSAP). However, it is a major undertaking to do such a thing in larger scale. But at the same time, it is necessary and well worth exploring, since both the BSAP and the WFD implementation will benefit from it. This will also increase the alignment of nutrient reduction requirements.

BFFE suggests that cooperation with farmers' organizations should be equally important to other undertakings by HELCOM, such as launching a common manure standard. Without the concrete involvement of farmers, technical improvements, new standards and advice will not be as successful as they could be. Therefore, we suggest that a new task force is set up to start the dialogue on how to enhance cooperation and involvement.

#### *Internal load slows the recovery of the sea (Items 25 - 27)*

The Baltic Sea is heavily loaded by nutrients (N and P) from industry, shipping, municipal waste, agriculture and other land use in the past decades. Even though the load from land-based sources is now continuously decreasing, the old phosphorus load will keep the Baltic Sea eutrophicated for at least 100 years. Besides this, only the phosphorus accumulated to date is described, and the role of nitrogen is left for a lesser extent.

We highly appreciate that the importance of the internal flux of nutrients is recognized and included in the Declaration. We agree that the knowledge base needs to be improved first, but it is not enough. The BFFE welcomes HELCOM's precautionary viewpoint of effects for the ecosystem, when it comes to large scale measures, but it is important to continue an ambitious work to understand and eventually address internal loading.

#### *Recycling of clean nutrients and organic matter needed (Items 28, 29)*

Nutrient recycling itself and used methods and technology are important from agricultural point of view. Despite the origin of nutrients, plants use them at the same way and they can also be lost. Many recycled nutrients are in organic form, and they need to be converted to soluble form before uptake by plants. If the decomposition of organic material is not quick enough, the risk of nutrient

leaching after the growing season increases. We remind that nutrient recycling itself does not reduce agricultural nutrient load, but everyday agri-environmental measures to reduce the risk of nutrient losses are needed, and they can be further developed and targeted.

In the current waste water processes, especially phosphorus is often bound to a form, unavailable for plants. The BFFE presents that the cleaning technology should also be developed from the point of nutrient utilization, as well as better removal of the harmful substances and micro-plastics is needed.

The BFFE emphasizes that farmers want to recycle nutrients, but not harmful substances. The BFFE appreciates that the risk assessment and safe recycling of nutrients is highlighted in the Declaration.

### *Climate change increases the risk of nutrient leaching (Item 48)*

Climate change directly affects the Baltic Sea, but there will be also many indirect impacts. If precipitation increases as forecasted, due the climate change, it means also higher risk of nutrient leaching. To reduce risk, we need to pay more and more attention to soil structure and water management on fields, and main drainage, such as open ditches, should be restored in many cases, as well. This can be done by applying the principles of so-called environmental river engineering. Otherwise this can cause unplanned flooding of arable land high in nutrients. This helps also to maintain and enhance the biodiversity of agricultural landscapes.

Farmers are equally concerned about the possible changes by climate change for food production, as HELCOM is about the consequences for the Baltic Sea. And, as for the Baltic Sea, still more understanding is needed of the effect of climate change on agriculture. Some new scientific reports announce, among other effects, possible increased risk for soil erosion and phosphorus losses, due to more frequent intensive rainfall. This could increase both N and P load from riverine transport to the Baltic Sea. In this context, BFFE would like to stress to not treat this question one-handed by HELCOM, as if it was only a matter of eutrophication.

Changed hydrological regime must be treated in a broader perspective. There is increasing number of international examples, where farmers provide the ecosystem service of storing large volumes of water, when flooding occurs. Therefore, a closer local collaboration is needed to enhance local solutions like wetlands and bufferzones on areas prone to flooding. It is also important that the HELCOM understands the important role that farmers and cultivation can play in mitigating climate change. The new climate-friendly bioeconomy uses are broad spectra of food and fiber from arable land and from forests, instead of fossil fuels. This will both increase social and economic sustainability, and in the long term reduce climate change.

## *Baltic Sea Action Plan*

Climate change and its effects must be taken into account when updating the BSAP. Agricultural load is a diffuse that is affected by the amount of precipitation, on which the farmers cannot have a personal influence. Farmers will do their best to reduce nutrient load, because the clean Baltic Sea is also important for them, but in very rainy conditions they run out of tools.

BFFE also stresses that it is important to recognize the time, which is needed to see the effects of the reduced load as a better water quality in the Baltic Sea. This means that the internal load should be included when updating the Baltic Sea Action Plan.

On behalf of the Baltic Farmers' Forum on Environment

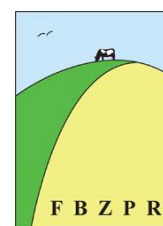


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