

HELCOM Secretariat  
Heads of Delegation (HOD)  
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## **Views of the Baltic Sea farmer organisations on the draft Ministerial Declaration on the revised HELCOM Baltic Sea Action Plan**

Preparations for the HELCOM Ministerial meeting in Copenhagen on the Baltic Sea Action Plan (BSAP) have reached an advanced stage. The draft Declaration to be adopted at the Ministerial meeting will transform the 2007 provisional country-allocated reduction targets (CART) for nitrogen and phosphorous annual nutrient input into final ones. These final reduction targets will then also feed into the EU Marine Strategy Framework Directive, according to our understanding. Agriculture is a significant diffuse source of waterborne nitrogen and phosphorous load to the Baltic Sea. Thus, the reduction targets and their subsequent legal and political impacts will be important to understand for the around 2 million farmers around the Baltic Sea and the farmer organisations. However, the current state of play gives rise to some concerns in this respect.

Six years have passed since the first BSAP Ministerial Declaration was signed in Krakow. We note with great satisfaction that the loads to the Baltic Sea continue to decrease substantially, partly due to strong efforts in the agricultural sector. For nitrogen it seems that the reduction targets have almost been met. Within the BSAP process as such, a lot has happened since 2007 as well, notably the model approach has been revised. Still, we believe that due to its simplicity and in many aspects imperfect model preconditions it can hardly provide more than limited guidance to the political decisions. Thus, we note with great concern that it is now rather proposed to be used directly, without any modification on justified scientific, political and economic grounds. Taking into account the uncontested fact that results from this natural science and recipient-based model are highly uncertain, there is a clear risk that some countries and sectors may get reduction targets that are disproportionate and even practically impossible to achieve.

In the final negotiations in 2007, the Baltic Farmers' Forum on Environment (BFFE) urged that at least a rough economic estimation of costs for achieving the nutrient input reduction targets should be carried out. We note however that this has not been done during the six years that have passed. When HELCOM now prepares to sign a Declaration with quantified reduction targets that in practice will become part of a binding EU Directive, it is of paramount importance to ensure a clear picture of the socio-economic costs and impacts of fulfilling these targets, including a specification of burden sharing. Otherwise, there is an obvious risk that the decision is not taken seriously, or that there is no real commitment to actually implement it. We do firmly believe that undertaking a socio-economic impact assessment is necessary to make the BSAP more robust, improve its legitimacy and increase the likelihood that new actions will take place to achieve its targets. Currently there are no plans for such impact assessment, which makes us highly concerned.

In the process leading up to the 2007 BSAP Ministerial Declaration, the BFFE also requested that a broader dialogue with society at large should be initiated. This dialogue should be designed so that real influence could be exercised without having to take part in the numerous scientific and other meetings leading to the decisions, as this is impossible to handle for practical reasons. We note that some progress has been done in this direction, through for example HELCOM Agri-environmental

Forum, but still more targeted dialogues on high level are required. In [A Vision for Sustainable Agriculture around the Baltic Sea](#), signed by 13 BFFE farmer organisations on 29 August 2012, we stated regarding our expectation on governments and administration that they should:

- *Listen to farmers' organisations and BFFE and take farmers' interest in to account in the environmental policy making processes.*
- *Support economic viability and competitiveness of agriculture as a key sector of the rural areas to ensure the development of the Baltic Sea Region.*
- *Provide a framework with realistic objectives, leaving sufficient flexibility to the farmers, recognising that regional or even farm specific solutions are often needed.*

We deeply regret that these points are neither sufficiently addressed in the current draft Declaration, nor in the process leading to it.

Furthermore, BFFE is missing clear explanation from HELCOM and its EU Member States on how the revised BSAP reduction targets and objectives connect to the environmental targets in the EU Marine Strategy Framework Directive (MSFD). The BFFE members have the impression that the revised reduction targets may directly transform into environmental targets within the MSFD. If this would be the case and taking into account the concerns that we have raised above, we fear that this may lead to disproportionate and excessive marginal costs for some countries and sectors.

Clearly the countries around the Baltic Sea are in different phases of improved nutrient handling and efficiency and thus also as regards reducing nutrient losses from farming. This implies that there is no one size fits all. While some measures are suitable for all farmers in the region, others have to be country-specific. Within the context of the EU Strategy for the Baltic Sea Region, three large EU-financed international projects have been successfully launched as a part of increased Baltic cooperation in this area: *Baltic Deal*, *Baltic Manure* and *Baltic Compass*. These projects initiated by the agricultural sector complement the major projects initiated by HELCOM in support of Russian agricultural developments. Agricultural projects of such magnitude are new in Europe and many lessons have been learned. The most important one might be that there is a large underutilised co-operation potential among farmers, the farmers' organisations, agricultural advisors, advisory organisations and scientists. The importance of demonstration farms, development of toolboxes, decisions support systems for farmers and new scientific initiatives arising from these new EU projects cannot be stressed enough. Therefore, such projects should be promoted and supported as an important element to fulfill the BSAP.

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