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Coalition Clean Baltic

To
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CCB proposals for Criteria to establish a list of Industrial Farm Hot Spots

CCB proposals for Criteria to establish a list of Hot Spots identifying installations for the intensive rearing of cattle, poultry and pigs not fulfilling the requirements in the revised Annex III of the Convention in accordance with the BSAP

CCB believe it is necessary to develop separate criteria for Industrial Farms Hot Spots and another set of criteria for other HELCOM Agricultural Hot Spots. If not it would probably be problematic to develop distinct criteria that would be appropriate for all kind of Agricultural Hot Spots. The action in the BSAP to establish a list of Industrial Farms Hot Spots is a very specific task for big animal farms, that can be seen as big Point Sources, and quite different from other agricultural areas with high nutrient run-off.

Industrial farms Hot Spot criteria

The following requirements, in accordance with Annex III, must be fulfilled
(We have modified and complemented the Point Sources Hot Spots criteria from the HELCOM Land 13/2008 document 4/6, trying to make them more distinct and clear and to include all important relevant criteria from Annex III, e.g. the very important requirements for maximum amount of manure nutrients per hectare and year, and manure storage capacity)

Point Sources Hot Spots

Agricultural farm/installation for intensive rearing of poultry, pigs and cattle with more than 40,000 places for poultry, 2,000 places for production pigs (over 30 kg), 750 places for sows or 400 animal units cattle should be included as a point source hot spot, if it is found not to fulfil the following characteristics:

1. it does not hold environmental/production permit fully co-ordinated by the relevant authorities, taking into account the whole environmental performance of the enterprise, covering emissions to air, water and land, generation of waste and prevention of environmental accidents and with permit conditions to be based on BAT .

2. The amount of livestock manure applied to agricultural land each year including by the animals themselves shall not exceed the amount of manure containing:
 - 170 kg/ha nitrogen
 - 25 kg/ha phosphoruswith a view to avoiding nutrient surplus, taking soil characteristics, agricultural practices and crop types into account.
A legal/authorized fertilisation plan shall be approved by national environmental authorities.
3. Manure storage must be of such a quality that prevents losses, and storage capacity shall be sufficiently large to ensure that manure is only spread when the plants can utilise nutrients (less than minimum level of 6 months manure storage)
4. Manure storage should be constructed to safeguard against unintentional spillages and be of such a quality that prevents losses. With regard to different types of manure, the following principles should be considered:
 - solid manure should be stored in dung yards with watertight floor and side walls
 - liquid manure and farm waste should be stored in containers that are made of strong material impermeable to moisture and resistant to impacts of manure handling operations.
5. Farm animal houses and similar enclosures for animals are located and designed in a way that ground and surface water will not be polluted.
6. Manure storage is constructed to safeguard against unintentional spillages and does not have such a quality that prevents losses, e.g. solid manure is not stored in dung yards with watertight floor and side walls, liquid manure and farm waste is not stored in containers that are made of strong material impermeable to moisture and resistant to impacts of manure handling operations.
7. Wastewater from animal housing should either be stored in urine or slurry stores or else be treated in some suitable manner to prevent pollution. Effluents from manure or from preparation and storage of silage should be collected and directed to storage units for urine or liquid manure.
8. Organic manures (slurry, solid manure, urine, sewage sludge, composts, etc) should be used in such a way that a high utilisation efficiency can be achieved. Organic manures shall be spread in a way that minimises the risk of loss of plant nutrients and should not be spread on soils that are frozen, water saturated or covered with snow. Organic manures should be incorporated as soon as possible after application on bare soils. Periods shall be defined when no application is accepted.

The most important Hot Spot Agri Point Source criteria is number 1,2 and 3 above. These criteria incorporate real figures (storage capacity and application rates for manure nutrients per hectare) that easily can be calculated and controlled.

National processes for selection of HELCOM Industrial Farms Hot Spots

We see the following process for selection of HELCOM Industrial Farms Hot Spots in Baltic Sea Region countries.

Step 1

All HELCOM countries establish a national list including all farms for intensive rearing of animals above the specified size that require an environmental permit, in accordance with Annex III (intensive rearing of poultry, pigs and cattle with more than 40,000 places for poultry, 2,000 places for production pigs (over 30 kg), 750 places for sows or 400 animal units cattle)

Step 2

For each installation identified in Step 1, information of the following conditions shall be recorded

- Check of valid environmental permit (farm type, size etc), including the valid fertilisation plan, and evaluate whether this is in accordance with legislation and regulations (The best source of information for industrial farms to be used should be the IPPC integrated permits, with attention on its quality and validity)
- Check if there are any proved legal problems related to environmental protection at the industrial farm (for example negative results of the national authorities' control), such as legal status, control mechanisms etc.
- Check of manure storage capacity, (to safeguard minimum 6 months storage)
- Calculation of manure production and of the nutrient content in the stored manure
- Check the area used for spreading manure (in accordance with fertilisation plans in the environmental permit)
- Calculation of the manure nutrient application rates (to safeguard that the nutrient level of 170 kg/ ha nitrogen and 25 kg kg/ ha phosphorus is not exceeded)
- Check and briefly describe whether the criteria 4-8 above are fulfilled or not

Our proposals above is the only way we can see how HELCOM contracting parties can fulfill the action in the BSAP to establish a list of Agricultural Point-Sources Hot Spots.

Deletion of Agricultural Point-Sources Hot Spots

When all criteria, in accordance with Annex III is fulfilled, an Industrial farm Hot Spot can be deleted from the established list.