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Coalition Clean Baltic

To
HELCOM HOD/Commission meeting, 4-5 March 2009

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, also including requirements on proper Fertilization plans for Point Source Hot Spots - Ind. Farms.

Industrial farms Hot Spot criteria

CCB proposes that Helcom document 2/17, Criteria for Agricultural Hot Spot Inclusion, Annex 2, Section 2 – Manure production and application , point 2.2 gives the following amendment:

A legal/authorized fertilisation plan shall be approved by agricultural and environmental authorities.

Adoption of proper Fertilization plans (including where and how much manure the company spreads per hectar on agricultural lands) for Industrial farms are of crucial importance to control the risk for nutrient run-off to watercourses.

The existence of fertilization plans, and its proper implementation is a cornerstone for governance of agricultural nutrient pollution to the Baltic Sea.

Requirements, in accordance with Annex III, must be fulfilled for 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.

For the same size of installations of industrial farms the IPPC directive requires, for HELCOM EU member states, an Integrated Permit (involving both agricultural and environmental authorities) which must include a Fertilization plan, to control that the manure is spread in accordance with environmental standards.

This means that all HELCOM EU member states already today require proper Fertilization plans for all installations mentioned above, besides industrial farms with more than 400 animal units cattle. So it would not be too much work for Helcom countries to summarize already existing information, as this is of crucial importance for Good Agricultural Practices.

For Russia, not being a HELCOM EU member state, the proposed requirement for proper Fertilization plans, might be a new regulation. But hopefully Russia could cope with such rules, and find appropriate ways to implement such regulations in the Baltic catchment of NW Russia and Kaliningrad region to guarantee high environmental standards for industrial farms in Russia.

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 other criteria from Annex III 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.