

Uppsala, Sweden
05 October 2015

To: Aneta Williams,
Head of Unit, DG Environment Unit C.4. Industrial emissions
European Commission

Re: Final draft of the BAT reference document for the Intensive Rearing of Poultry or Pigs (IRPP BREF) -
Proposal for some rewording in the BAT conclusions 30 to 34

On behalf of member organizations of the Coalition Clean Baltic (CCB), we would like to express appreciation for the preparatory work done by the TWG with the IRPP BREF and BAT Conclusions – it is an important step towards stricter regulation of the aforementioned sector.

With the understanding that the BREF sets number of new BAT provisions i.a. addressing pollution prevention, resource-efficiency for nutrients, water and energy, as well as nuisances minimization (e.g. odour) we would like to point to several major concerns, especially with regards to the Baltic Sea Area:

1. In general, the proposed BAT for manure management does not necessarily/clearly encourage nutrient recycling path and hence does not follow the circular economy thinking and waste management hierarchy, that should primarily address recycling and recovery of manure's nutrient and/or energy value.
2. It would be advisable to set up clear minimum manure storage capacity (in months of storage) for boreal area. Currently, despite stricter national requirements set by some Baltic Sea Member States, the Nitrates Directive requires stricter manure storage provisions only within Nitrate Vulnerable Zones, not always effectively designated by the Member States to curb nutrient inputs and, hence, eutrophication.
3. Cattle manure, as well as animal waste produced by other types of animal husbandry (horse, goat, sheep, fur farms, etc.) need also to be addressed by IED requirements as it represents another big share of pollution inputs, as well as equally important source of nutrients/energy that could be diverted from waste streams into a resource.

Most of the above is to a certain extent addressed by the [Convention on the Protection of the Marine Environment of the Baltic Sea Area](#) (Helsinki Convention or HELCOM, 1992) and its [Annex III, part II "Prevention of Pollution from Agriculture"](#), which the European Union is a Contracting Party to. However, to most of the EU Member States, being also HELCOM Contracting Parties, the EU *acquis* remains prevailing, resulting in low level of enforcement of stricter HELCOM requirements.

Yours sincerely,



Jakub Skorupski
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CCB Executive Secretary

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Coalition Clean Baltic is a network of environmental NGOs sponsored by:

- Ecohome, Belarus • Danish Society for Nature Conservation • Estonian Green Movement • Finnish Association for Nature Conservation • Finnish Society for Nature & Environment • Bund für Umwelt und Naturschutz Deutschland, BUND • Environmental Protection Club of Latvia, VAK • Latvian Green Movement
- Lithuanian Green Movement • Lithuanian Fund for Nature • Polish Ecological Club, PKE • Green Federation - GAJA, Szczecin, Poland
- Friends of the Baltic, St Petersburg, Russia • Ecodefense, Kaliningrad, Russia • Neva River Clearwater, St Petersburg, Russia • Green World, St Petersburg, Russia • The Guide Environmental Group, Kaliningrad, Russia • Greens of Karelia, Petrozavodsk, Russia • Friends of the Earth, Sweden
- Swedish Society for Nature Conservation • Swedish-Polish Association for Environmental Protection • WWF Sweden • The Western Center of the Ukrainian Branch of the World Laboratory

Comments of IED Article 13 forum members on the proposed content of the IRPP BREF

Comments from (Forum Member)	Comment number	Chapter No. / section No. (if available)						Chapter title (only if there is no section or chapter No.)	Page # (PDF version of the document)	Comment description	Proposal for modification	Rationale
CCB	1	2	6	10				111 737	It would be advisable to set up clear minimum manure storage capacity (in months of storage) for boreal area. Currently, despite stricter national requirements set by some Member States (e.g. within Baltic Sea Region), the Nitrates Directive requires stricter manure storage provisions to curb nutrient inputs and, hence, eutrophication only within Nitrate Vulnerable Zones, not always effectively designated by the Member States.	ADD applicability remark in BAT15, technique (d), clarifying that for boreal (Baltic Sea Area), sufficient capacity of manure storage facility should refer to regionally set requirements, meaning <u>six month minimum storage capacity</u> (see Rationale for explanation)	According to Table 2.15 in the final draft IRPP BREF, In Denmark, Finland and Sweden, the minimum manure storage capacity is set to over 6 months, taking into account the hydrological and climatic conditions of the boreal area that does not allow spreading of manure in early spring, according to our knowledge this equally applies to Germany, at least its part in the Baltic Sea catchment; Part 2, Annex III of the Convention for Protection of the Baltic Sea Marine Environment (Helsinki Convention, 1992, to which the European Union is a Contracting Party), requires in Regulation 2(3) that "the storage capacity shall be sufficiently large to ensure that manure only will be spread when the plants can utilize nutrients. The minimum level to be required should be 6 months' storage capacity. " Despite that the most recent changes in these provision became effective in 2008, the previous version of the Annex dates back to 2000, when the same requirement was made effective, taking into account the critical state of the Baltic marine environment with regards to eutrophication.	
CCB	2	2	7					124	In general, the proposed BAT for manure management does not necessarily/clearly encourage nutrient recycling path and hence does not follow the circular economy thinking and waste management hierarchy, that should primarily address recycling and recovery of manure's nutrient and/or energy value. Likewise, cattle manure, as well as animal waste produced by other types of animal husbandry (horse, goat, sheep, fur farms, etc.) represents another big share of pollution inputs, as well as equally important source of nutrients/energy that could be diverted from waste streams into a resource	Support a proposal by ESPP (cf. comment 2), that a development of a separate "future BREF addressing manure processing and valorisation, on-farm and centralised, from <u>all types of livestock production</u> ", should be encouraged.	Critical importance of phosphate fertilisers for modern agriculture, while phosphate rock resources are finite. Losses of phosphorus at farm cycle are not being properly addressed, while secondary sources of phosphates (e.g. in manure) are still treated as wastes rather than valuable nutrient resources. <i>Ref: Scoping study to identify potential circular economy actions, priority sectors, material flows & value chains. Funded under DG Environment's Framework contract for economic analysis ENV.F.1/FRA/2010/0044.</i> At the national level, there are already examples of applying nutrient recycling strategies (e.g. Finland), linking animal and crop production	