

POLICY RECOMMENDATIONS FOR NUTRIENT OFFSETS

NutriTrade Final seminar

May 25, 2018

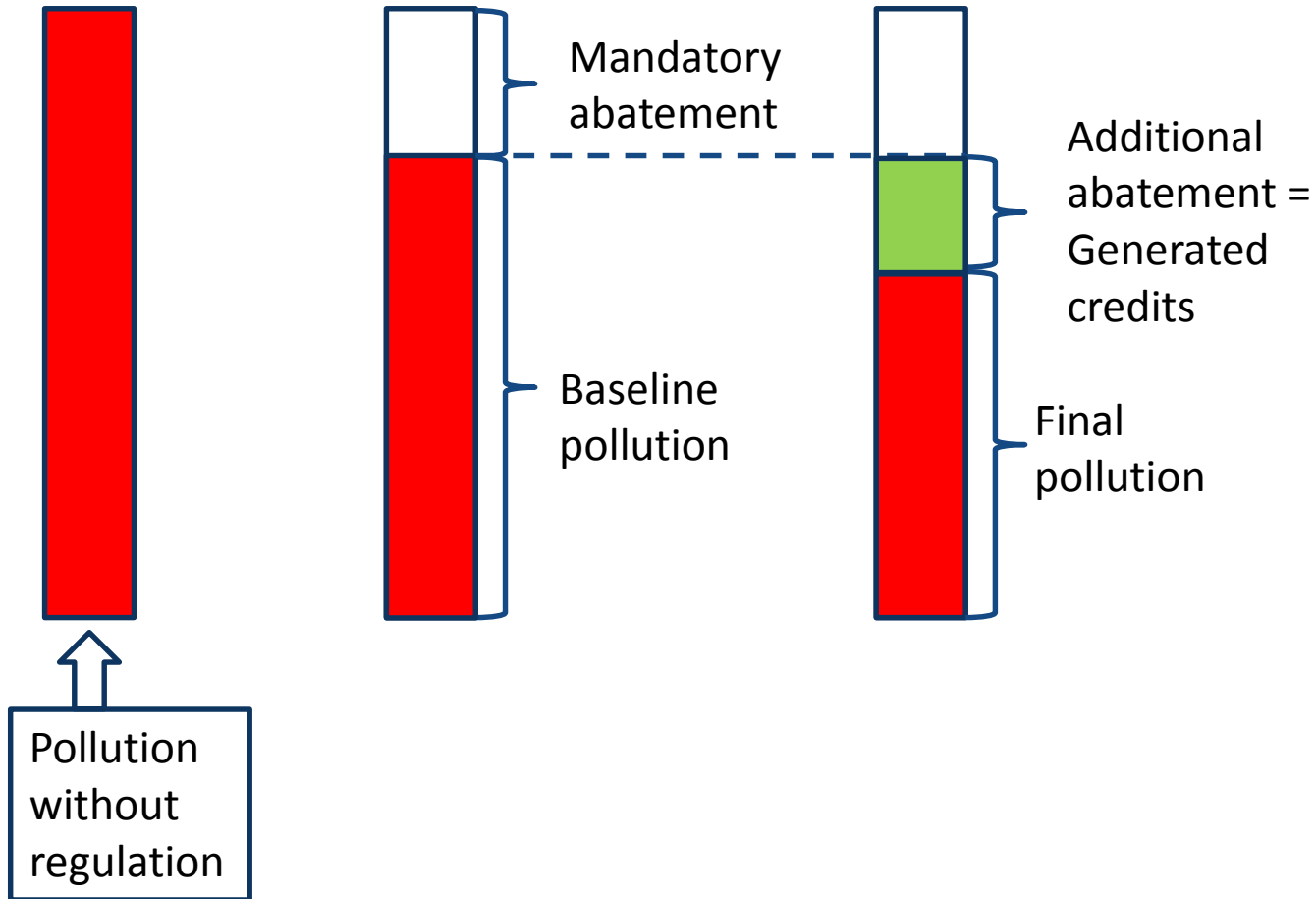
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Summary

- Nutrient offsets could be utilized in environmental permitting; perhaps even should be used due to Weser-ruling
 - Such practices are unlikely to emerge without explicit legislative measures; key ministries should act
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- Offsets could be utilized in promoting Baltic Sea wide cooperation
 - Unlikely to be included in BSAP targets
 - National/City Pride & Prestige via verified abatement achievements
 - HELCOM to provide status & visibility for such offsets

Nutrient offset/credit



- Credits can be generated by extra abatement, i.e. abatement exceeding mandatory level
- These can be used as offsets (for the same pollutant) elsewhere
- Must be verified
- Location

Role of Nutrient Offsets in National Policies

Nutrient loading and regulation

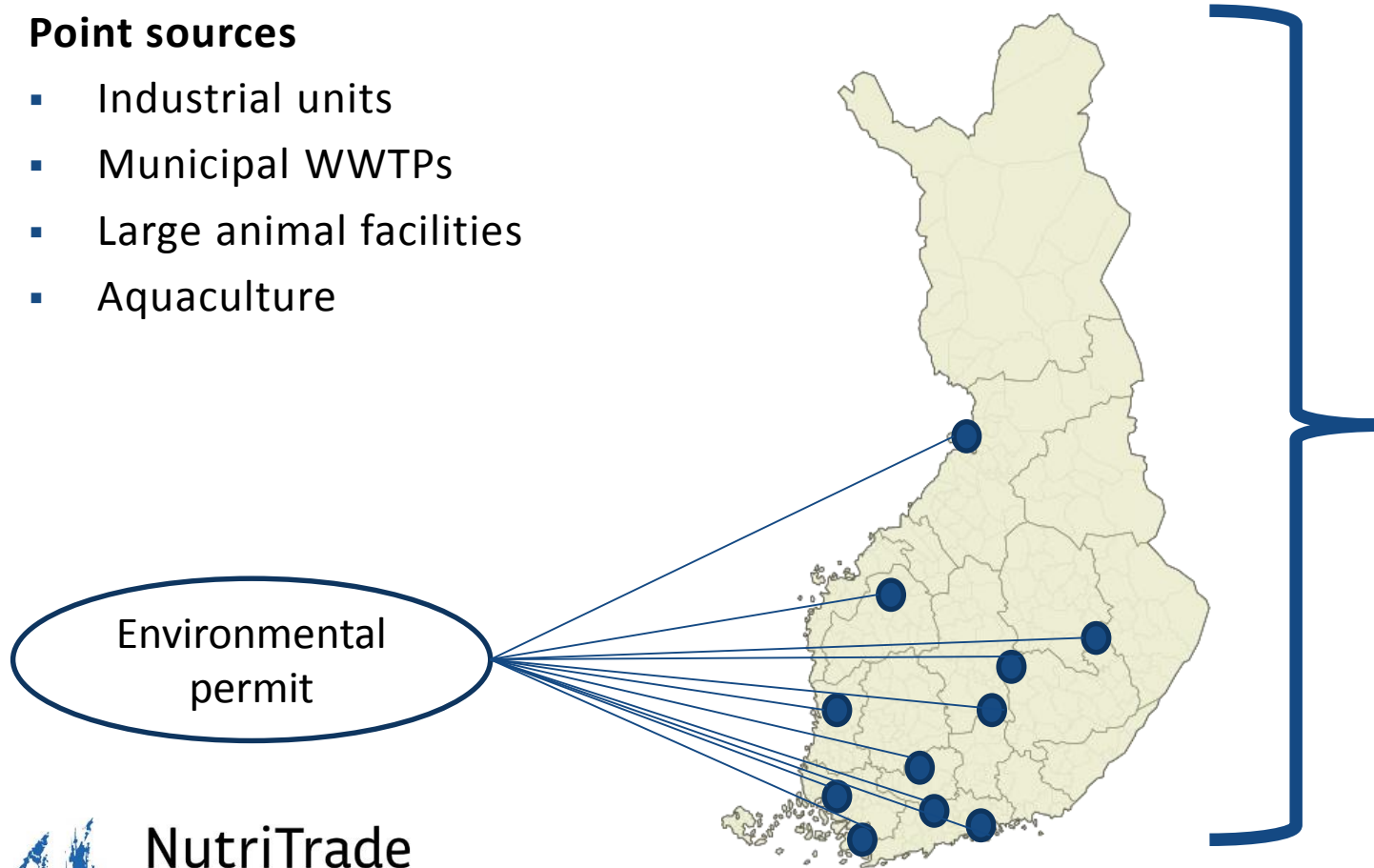
Point sources

- Industrial units
- Municipal WWTPs
- Large animal facilities
- Aquaculture

Non-point sources – large areas with no specific outlets of pollution

- Forestry
- Crop production

Regulated via EU Common Agricultural Policy (CAP), other laws & regulations



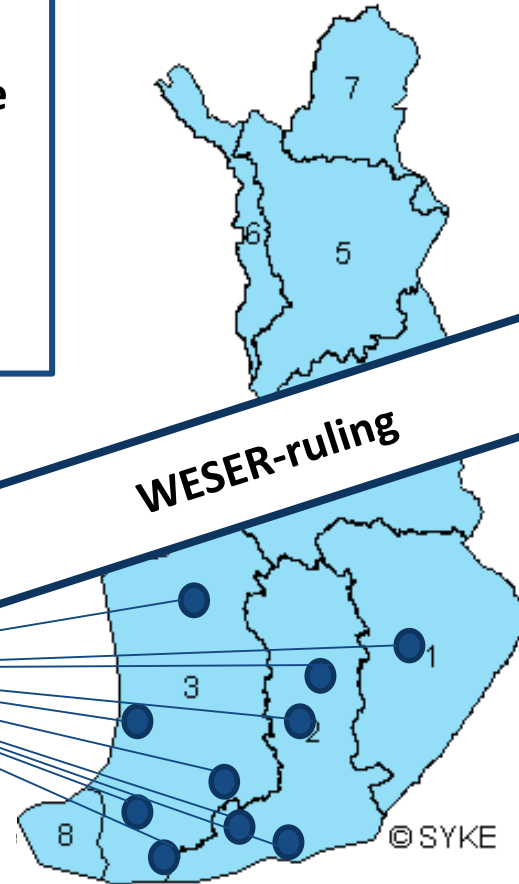
Role of Nutrient Offsets in National Policies

Receiving water bodies and regulation

The Industrial Emissions Directive
The Urban Waste Water Directive
National Environmental Law
Local Regulations

Environmental permit

WESER-ruling

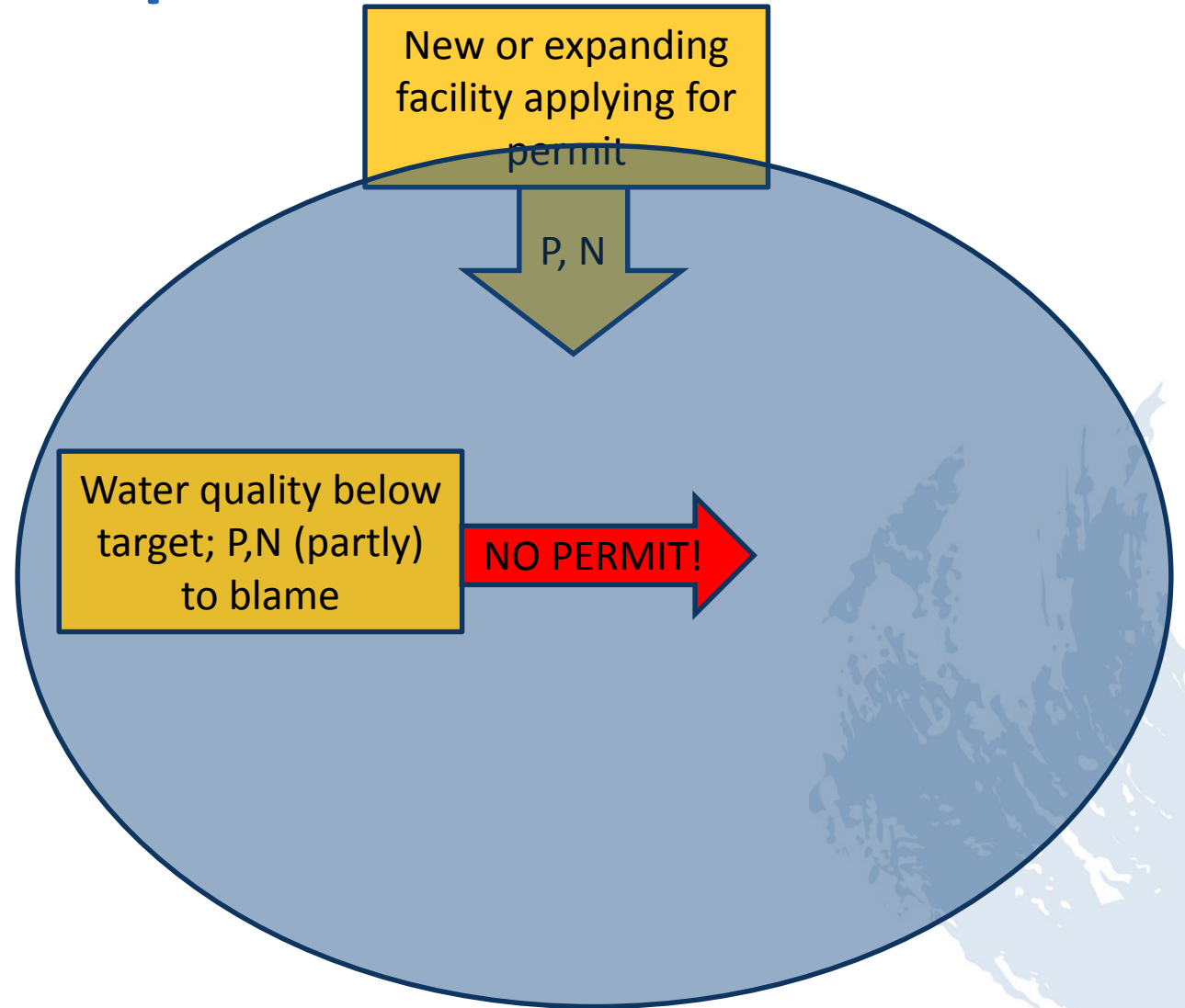


Water Framework Directive

- 8 River Basin Districts
- ~ 6000 (natural) surface water bodies
- River basin management plans
 - Target water quality
 - Business as usual water quality
 - Measures, if target will not be met
- Initially: guidance for water protection

Weser ruling (C-461/13)? Simplified

- Current premitting system looks at P,N
- Preventing the deterioration of environment the underlying reason for permitting system
- Meet BAT → permit
- Weser makes this a specific target
- If water quality does not meet the target, activity that adds to critical pollutant not granted a permit



Weser ruling (C-461/13)?

- Strengthens the legal status of WFD-specific water quality standards
- Helps safeguard water quality
- Is inflexible, unequal if interpreted strictly
- Mechanistic Approach possible with 6000 water bodies?
- Interpretation not yet clear



How Could Offsets Be Utilized in Permitting Procedures

- Requirement: no net increase of nutrient loading to the water body
- To earn a permit,
 - Conduct additional abatement measures
 - Pay for a third party to do soto neutralize to extra loading from your facility
- Would allow for growing/changing economic activities while confing the total load
- *Sweden: Proposition for a government bill to allow for compensation*
- *Åland: similar proposition*
- *Denmark: Ok if other activities under WFD action programme neutralize the effect (within 6 years)*

Critical when designing the offsets

- Models vs measurements
- Verification procedures
- Location & timing
- Unit of measurement
- No trade-offs in other environmental attributes
- Additionality
- Measures targeting nutrient loading vs nutrient stock in lake/sea
- Room for interpretation vs comprehensive rules



Role of Nutrient Offsets in International Policies

- International cooperation in Baltic Sea protection would help achieve the targets with lower costs
- Baltic-wide Cap&Trade unrealistic
- Utilization of Joint Implementation in meeting MAIs politically far fetched



Making Good Work Visible in International Marine Protection

- What if Baltic Sea cities and countries were being credited to do excessive abatement?
 - Not deducted from their MAI
 - Calculated & verified
 - Acknowledged, promoted and made visible by HELCOM
- Potential way of promoting sea based measures
- Why would countries/cities do this?
 - To make citizens happy?
 - To make citizens proud?
 - To make water engineers motivated and uplifted?
 - To feel good?
- Whatever the reason, this is already happening: Turku, Helsinki, Porvoo
- Could the same motivation, Pride & Prestige, be extended to countries?
- Could this be acknowledged and promoted by HELCOM?
- In addition to MAI, Voluntary Abatement Credit (VAC)



Lessons for Any Water Protection Policies

- Quantify, quantify, quantify
- Choose the right metric
- Coordinate actions to improve efficiency



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