

Schleswig-Holstein  
Der echte Norden



Schleswig-Holstein  
Ministerium für Energie-  
wende, Landwirtschaft,  
Umwelt und ländliche Räume

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Ihr Zeichen:  
Ihre Nachricht vom: 23.12.2015  
Mein Zeichen: V 443 - 12017/2016  
Meine Nachricht vom: /

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15.01.2016

## Strategic Environmental Assessment (SEA) for a bill amending the agricultural use of fertilizers

Dear Peter Byrial Dalsgaard and Harley Bundgaard Madsen,

Thank you for informing us on the public hearing process on changes in the Danish fertilizer legislation. We are aware, that yield rates from Danish farms decreased by 20 % in the last years as a consequence of the previous fertilizer legislation. In Germany, the fertilizer ordinance is still under review. With the expected new German legislation, stricter standards for fertilizer planning and application will come into force.

Regarding the material made available for the public hearing on the Danish fertilizer legislation, we have to admit that it does not allow for finding out which concrete (quantitative) changes are planned. To be able to estimate what will be the follow up of the planned changes for our transboundary as well as the German waters, we would be very grateful if you could provide additional information in the documents.

We are slightly concerned, that the new Danish regulations will affect the assessment results of ecological water quality of transboundary coastal water bodies and the chemical water quality of transboundary groundwater bodies negatively. For the transboundary coastal water bodies, it is assumed, that the planned changes in fertilizer application in Denmark will be compensated by the described nutrient reduction measures in the catchment areas. Therefore, we welcome these measures to minimize the effect of higher fertilizer application rates and consequently higher losses to the aquatic environment. Nonetheless, quantitative information needed to be provided – on both –, the new inputs and the effects of the planned compensation measures. For the transboundary coastal waters and rivers in the catchment of Flensburg Fjord we think, setting up a common monitoring strategy for evaluating changes in fertilizer input and the effect of measures on both sides of the Fjord would be a good idea. A first report could be delivered to the public together with the interim report for the Water Framework Directive at the end of 2018. Referring to the chemical status of groundwater bodies in the transboundary regions, we were not able to calculate possible effect as well. In Schleswig-Holstein, groundwater

bodies in the sandy areas formed after the Weichselian glaciation as sandy outwash plains are often in a bad chemical quality due to nitrate concentrations above 50 mg l-1. We were not able to find any information in the documents provided on the assumed effects of the planned changes in Danish fertilizer legislation regarding the water quality in the upper groundwater bodies especially in the transboundary region. Does the new Danish fertilizer legislation distinguish between different natural (soil) regions? We suggest, including these information into the strategic environmental assessment on the future Danish fertilizer legislation.

Regards



Michael Trepel

Verfügungen:

Stufe	Kategorie	Erlassen von	Erlassen für	Fällig am	erledigt	Aufgabe	Vermerk
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Wiedervorlagen:

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