



# How to deal with exemptions and *one-out all-out* principle

one-out all-out principle

How to deal with exemptions and

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# One out all out principle

→ Monitoring of most sensitive biological quality element?

## Pressures

Agriculture  
Wastewater  
Forestry  
Industry  
Mining  
Peat productions  
...

## Effects

Eutrophication  
Acidification  
Brownification  
Chemical pollutions  
...

## Biological quality elements

Phytoplankton

Littoral benthic macroinvertebrates

Profundal benthic macroinvertebrates

Macrophytes

Benthic diatoms

Fish

→ Quality of monitoring data?  
expert judgement

E  
X  
E  
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S

#### 4.4 Deadline → 2021/2027 or asap after 2017

~~technical feasibility~~  
~~disproportionately expensive~~  
natural conditions

Cannot be used after 2027 → all measures in actions by 2027!

Can be used after 2027, but has to be re-evaluated every 6 years

#### 4.5 Less stringent objectives

objectives would be **infeasible or disproportionately expensive**  
Only applicable if the water body is already below good status

How to set limit to the use?

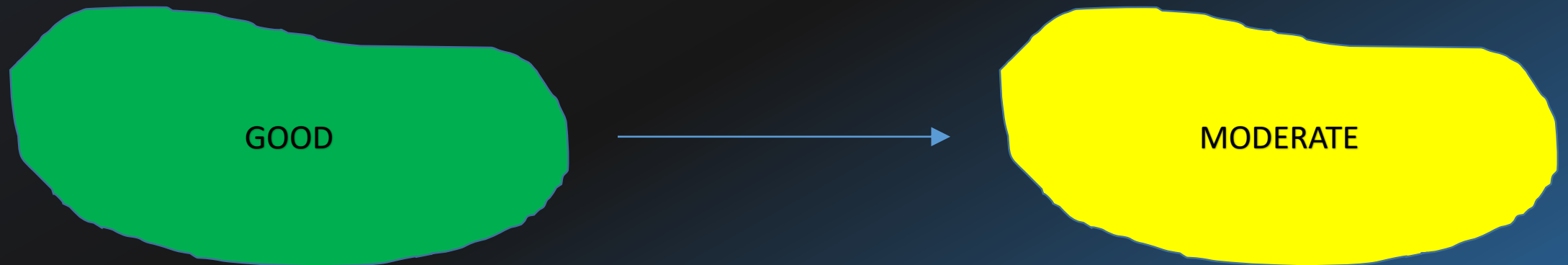
#### 4.6 Temporary deterioration of the status

natural cause  
«force majeure»

#### 4.6 Deterioration or failure to achieve good status/potential as a result of *new modifications to the PHYSICAL characteristics* of a surface water body

alterations to the level of bodies of groundwater  
status deterioration only from HIGH status to GOOD status as a result of *new sustainable human development activities*.

No exemption provided if deterioration to below good is caused by inputs of pollutants from point or diffuse sources!



# ELY centres role in the implementation

POM



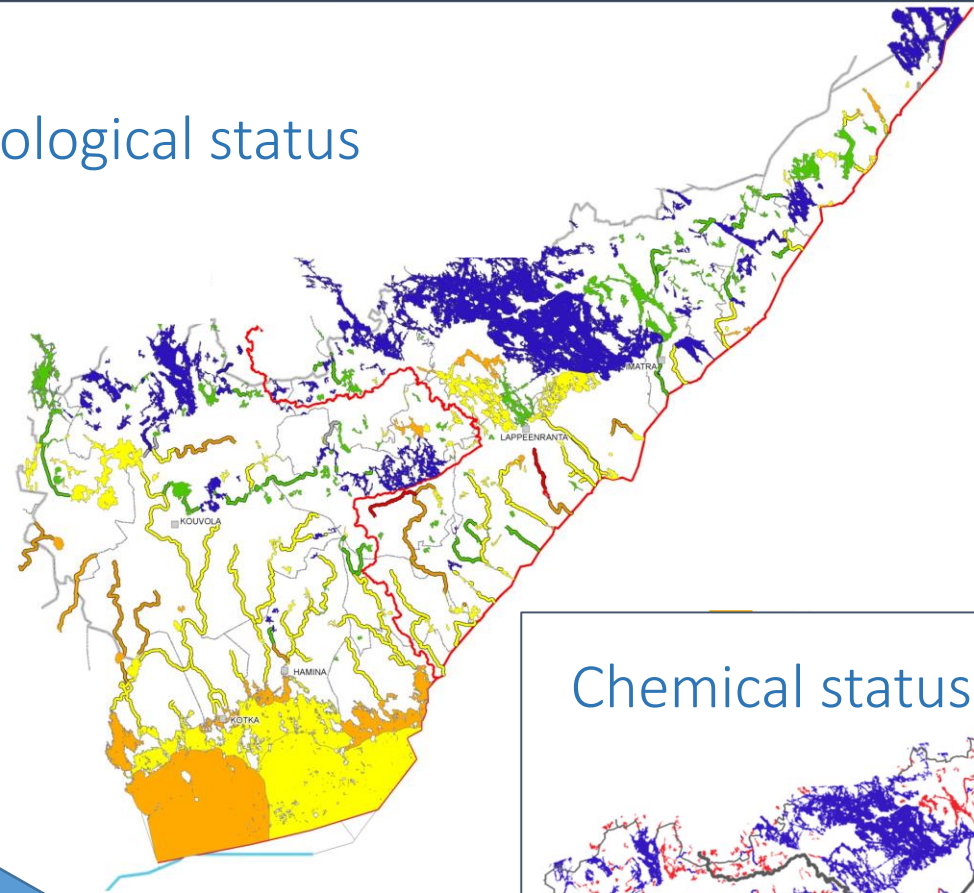
- Strong influence on environmental permits (point
- Limited influence to non-point pollutions



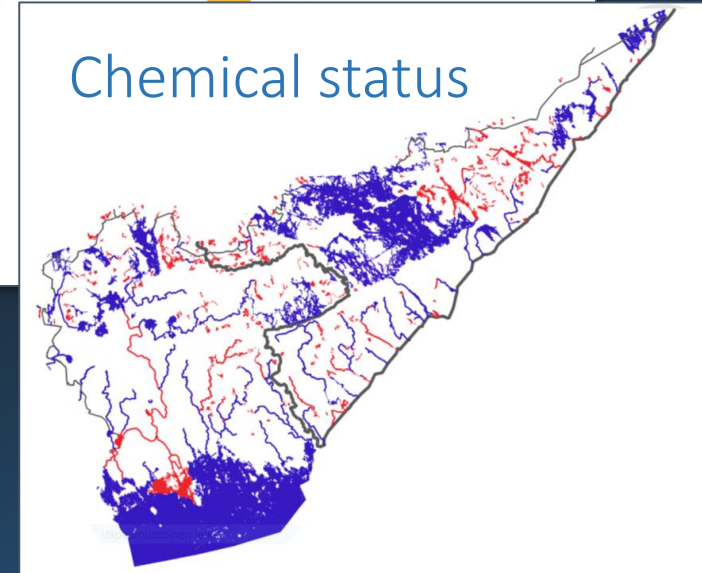
**EXEMPTIONS  
IN DEADLINE  
(2021/2027)**



Ecological status



Chemical status





# Exemptions – Bay of Virolahti



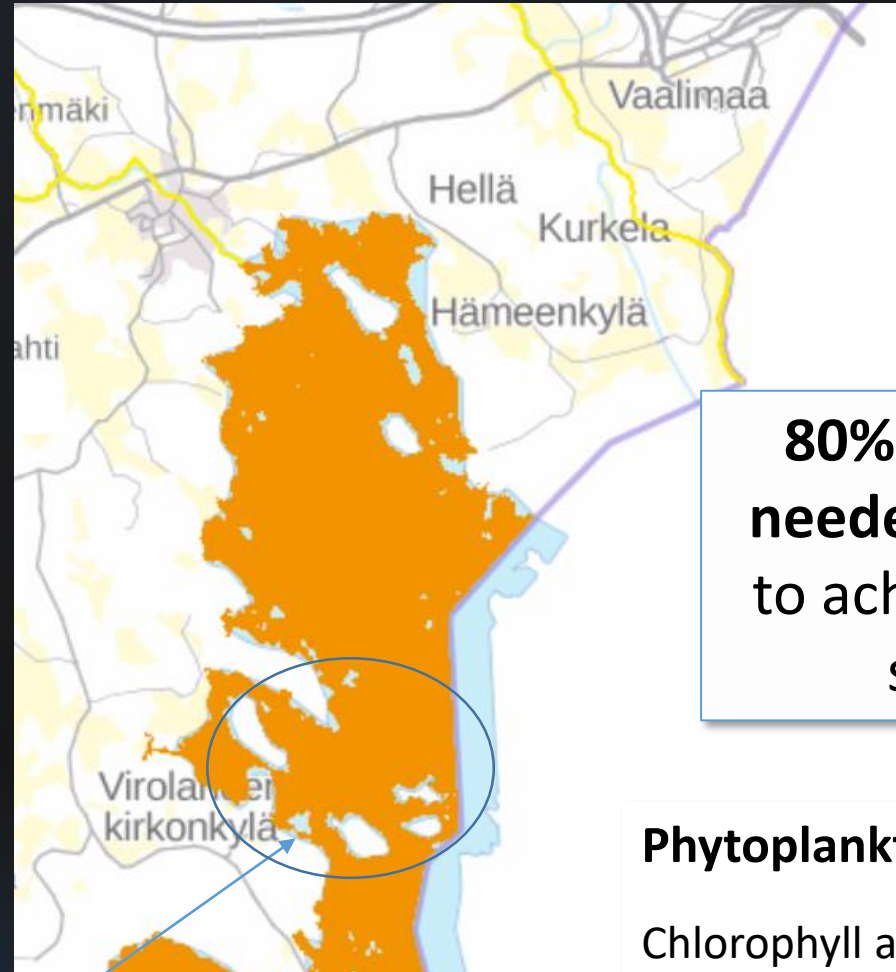
# Bay of Virolahti

Ecological status: POOR → exemption 2027 (natural conditions)

- Pressures:

- Wastewater treatment plant (closed 2003)
- Agriculture, forestry and scattered settlements
- 2 fish farms –applying permissions for additional fish cages

**ELY centres statement:** The additions in fish farm production are in controversy with the aim of WFD and the production should be transferred further away to the sea especially if the production will be increased



**80% reduction needed in total P to achieve GOOD status!**

Phytoplankton	
Chlorophyll a	POOR
BBI –index	GOOD

Water quality		
Total P	34,14µg/l	POOR
Total N	439,25 µg/l	MODERATE
Secchi depth	1,49 m	POOR

What about the non-point pollution?



# Conclusions

We shouldn't lower the ambition concerning non-point pollution → there is a lot of potential

- Stronger (spatial) prioritization and allocation of funds
- Rural subsidies should not be based on land area but on the crops and the real environmental measures
- Planning of measures that can be obtained in the middle of a CAP period ?
- Planning of measures to prevent the effects of droughts and floods in all catchment areas
  - Identification and mapping of fields that are flooded
  - Planning and financing of environmental drainage
  - Land use in peatlands (agriculture, peat production and forestry)

→ Real cooperation with flood risk management planning and outside the flood risk areas

Use of less stringent objectives should be carefully considered and justifiable!





# Conclusions - "One out all out"

- There are 190 000 lakes or ponds larger than 100 m<sup>2</sup> in Finland, but only 4617 lake water bodies are included in the POMs

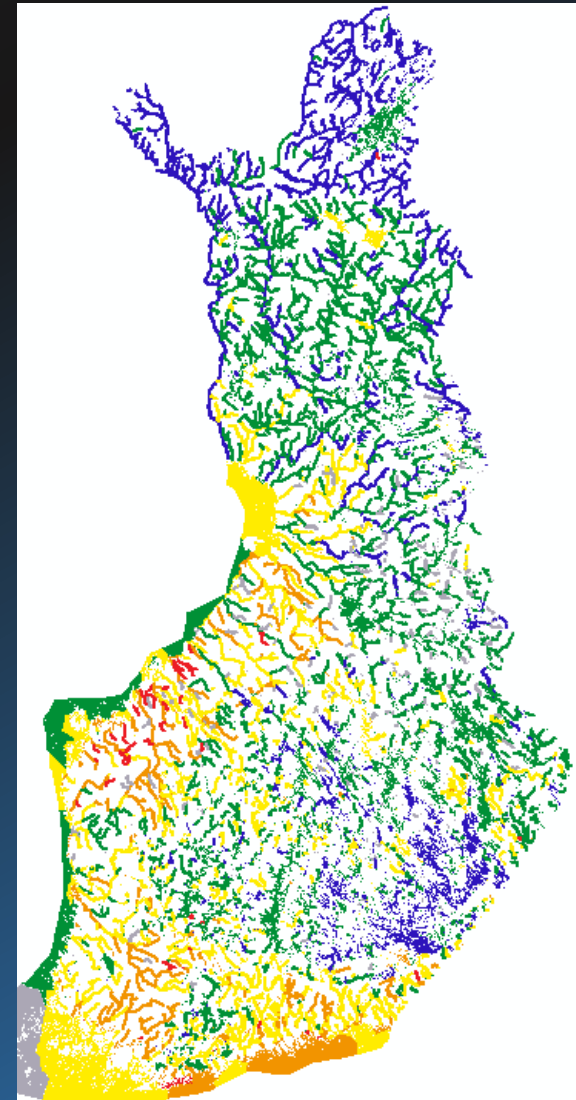
We need more data on the biological elements and their interaction with the pressures

→ stronger use of polluter pays principle


→ obligated monitoring to the non point polluters (agriculture, forestry and scattered settlements)

It's extremely difficult to estimate the effects of certain human activity or a new project on a certain biological quality element

→ perhaps the estimates could be done only for e.g. nutrients and oxygen levels (more straightforward)?





A scenic view of a river flowing through a lush green forest. The river is the central focus, with white water rapids cascading over dark, jagged rocks. The surrounding forest is dense and vibrant green. In the foreground, a dark, textured surface, possibly a railing or a piece of wood, is visible, featuring intricate, light-colored patterns that resemble traditional Finnish woodwork or a decorative finish.

Thank you for your  
attention!

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