

Abating N in Nordic agriculture - policy, measures and way forward

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Abstract

During the past twenty years, the Nordic countries (Denmark, Sweden, Finland and Norway) have introduced a range of measures to reduce losses of nitrogen (N) to air and to aquatic environment by leaching and runoff. However, the agricultural sector is still an important N source to the environment, and projections indicate relatively small emission reductions in the coming years.

The four Nordic countries have different priorities and strategies regarding agricultural N flows and mitigation measures, and therefore they are facing different challenges and barriers. In Norway farm subsidies are used to encourage measures, but these are mainly focused on phosphorus (P). In contrast, Denmark targets N and uses control regulations to reduce losses. In Sweden and Finland, both voluntary actions combined with subsidies help to mitigate both N and P.

The aim of this study was to compare the present situation pertaining to agricultural N in the Nordic countries as well as to provide recommendations for policy instruments to achieve cost effective abatement of reactive N from agriculture in the Nordic countries, and to provide guidance to other countries.

38 To further reduce N losses from agriculture, the four countries will have to continue to take
39 different routes. In particular, some countries will need new actions if 2020 and 2030 National
40 Emissions Ceilings Directive (NECD) targets are to be met. Many options are possible, including
41 voluntary action, regulation, taxation and subsidies, but the difficulty is finding the right balance
42 between these policy options for each country.

43 The governments in the Nordic countries should put more attention to the NECD and consult
44 with relevant stakeholders, researchers and farmer's associations on which measures to prioritize
45 to achieve these goals on time. It is important to pick remaining low hanging fruits through use
46 of the most cost effective mitigation measures. We suggest that N application rate and its timing
47 should be in accordance with the crop need and carrying capacity of environmental recipients.
48 Also, the choice of application technology can further reduce the risk of N losses into air and
49 waters. This may require more region-specific solutions and knowledge-based support with
50 tailored information in combination with further targeted subsidies or regulations.

1. Introduction

The supply of nitrogen (N), being an essential nutrient, has been vitally important for increased food production to support the growing global population and the diet change over the past century (Battye et al., 2017).

The Haber-Bosch process, which transforms atmospheric N₂ to form reactive N (ammonium and nitrate), made it possible to intensify agriculture and increase food production. As a result, industrially produced mineral fertilizer is today the largest source of reactive N in Europe (Sutton et al., 2011). During the past six decades, anthropogenic production of reactive N in the world has increased almost five-fold (Battye et al., 2017). Organic material like manures or root nodules of leguminous, and deposition of N from the air, also provide N into the soil along with the easily soluble nitrate compounds or ammonium-nitrates from inorganic fertilizers. Organic N can be mineralized to ammonium and nitrates by microbial reactions in soil.

Reactive N, derived from both fertilizer and organic compounds, may contribute to several environmental effects. This occurs through emissions to air (ammonia NH₃, nitrous oxide N₂O and nitrogen oxides NO_x), and to water, (nitrate NO₃⁻, organic N, ammonium NH₄⁺ and NH₃ by deposition) affecting ecosystems, climate and human health (e.g. Galloway et al., 2003; Krupa, 2003; Erisman et al., 2013; Sutton et al., 2009; 2011; 2013). For instance, Leip et al. (2015) estimated that the agricultural sector in Europe contributes to 59% of N water quality impacts.

In the Nordic countries, the level of N related problems varies. Denmark has the highest N-loss per national area compared with the other Nordic countries, due to the high percentage of agricultural area (62%), see Table 1. Also, Denmark has the largest meat production, particularly from pigs. The meat production in Sweden is only about 30% of the total production in Denmark, and in Finland and Norway it is even smaller (about 20%), see Table 1.

Table 1. Agricultural statistics in the Nordic countries; agricultural land, nitrate vulnerable zones (NVZ), meat production and N surplus from agricultural land. Source: FAO FAOSTAT, Eurostat (<http://ec.europa.eu/eurostat>) and SSB (www.ssb.no). Data refer to 2015 or more recent years.

	Total landarea (km ²)	Agricultural land (km ²)	NVZ (km ²)	Meat production* (thousand tonnes)					N surplus (kg ha ⁻¹)	Total N surplus (ktonnes)
				pig	cattle	poultry	sheep	Total		
Denmark	41,990	26,110 (62%)	26,110 (100%)	1,530	124	164	2	1,820	80	209
Sweden	407,310	30,398 (7.5%)	22,800 (75%)	240	132	159	5	536	32	97
Finland	303,910	22,734 (7.5%)	22,734 (100%)	179	85	129	1	395	49	111
Norway	365,245	9,061 (2.5%)	2,712 (30%)	137	85	101	27	351	100	91

*Only includes slaughtered animals.

A higher share of farm land, intensive livestock production (primarily pigs), higher farming intensity and the sandy soils have contributed to more severe N problems in Denmark compared with the other Nordic countries. Consequently, from 1985 a series of political action plans were implemented in Denmark to mitigate losses of N and other nutrients (Dalgaard et al., 2014).

In Finland, the concerns about eutrophication arose by the 1960's, and increasingly since 1995 a set of legal and voluntary instruments have been implemented, targeting agricultural nutrient

84 losses to waters. Previously, increased N inputs and clearing forested land to develop new fields
85 gradually increased agricultural N losses in Finland. However, between 2007 and 2012 N loads
86 from agriculture were reduced by 10% (Rankinen et al., 2016).

87 In Norway, during the 1980's and 1990's, a system of regulation and economic instruments
88 coordinated by local authorities was developed to encourage farming practices that would reduce
89 diffuse sources of nutrients from agricultural land and point sources such as silos and manure
90 storage systems. The economic instruments have focused mainly on mitigation measures for
91 losses of phosphorus (P) with a side effect on N. The system has been fine-tuned over the years
92 to target areas with high risk of erosion and P losses. However, due to low focus on N, surpluses
93 per agricultural land area are generally higher in Norway compared with the other Nordic
94 countries, see Figure 2.

95 In Sweden, legislation on storage and spreading of manure was introduced by the 1980's and
96 expanded in subsequent years. The measures have targeted reductions of both N and P. In 2001,
97 the voluntary advisory program "Focus on Nutrients" ("Greppa Näringen") was initiated in order
98 to meet national environmental objectives including reduced eutrophication and climate change.
99 Support schemes within the Rural Development Program (RDP), e.g. for catch crops, have also
100 been important to reduce nutrient loads to air and waters.

101 The aim of this study was to compare and discuss the present situation pertaining to agricultural
102 N in the Nordic countries as well as to provide recommendations for strategies and policy
103 instruments to achieve cost effective and balanced abatement of reactive N from agriculture in
104 the Nordic countries, and to provide guidance to other countries.

105 **2. N management in the Nordic countries**

106 **2.1 Measures to reduce ammonia emissions**

107 Since agriculture emits most of the ammonia in Nordic countries, the agricultural sector must
108 promote emission reductions. An overview of measures to reduce ammonia emissions in the
109 Nordic countries, and level of implementation, is provided in Table 2.

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Table 2. Overview of measures to reduce ammonia emissions in the Nordic countries. The costs are representing € per kg N reduced, and are primarily based on cost estimates from Sweden and Denmark. Updated from Hellsten (2017).

Measure	Denmark	Sweden	Finland	Norway
<p>Low N feed Reduces ammonia emissions at many stages of manure management, from excretion in livestock houses, through storage of manure to application on land, including grazing. Also positive effects on animal health and indoor climate. This measure could be increased by providing information and counselling about low N feed or phase feeding (i.e. the protein content of the feed is adjusted over the lifetime of the livestock). Reduction potential: about 20% (van Vuuren et al., 2015). Cost: -0.5 - 0.5 € (van Vuuren et al., 2015).</p>	<p>Phase feeding of livestock has been successful in reducing ammonia emissions from the pig industry. For instance, crude protein level recommendations for grower finisher pigs are 14.2-16.5% depending on weight (Tybirk, 2015). Phase feeding is used for almost all sows and piglets, but only for 30-40% of finishers. In dairy production with automatic milking systems (~25% of Danish dairy farms), dairy cows are allocated protein feed based on milk yields.</p>	<p>Crude protein levels in pig feed have been low since 1990. Feed for a standard growing-finishing pig in Sweden generally contains 14.5% crude protein (Botermans et al., 2010). Therefore the potential to reduce ammonia emissions is limited. Botermans et al. (2010) have estimated a 20% reduction in ammonia emissions if the crude protein level would be further reduced to 12.5%.</p>	<p>Phase feeding is utilized and the advisory systems deliver information on N requirement during different feeding phases.</p>	<p>No policy regarding low N feed exists in Norway.</p>
<p>Low emission housing Measures to reduce the surface area and time manure is exposed to air, e.g. design of the stable and manure handling system. Most efficient and cost effective for new livestock houses. This measure could be increased by regulations regarding new livestock houses. However, effect of housing design on animal welfare needs to be considered, e.g. the possibility to have loose dairy and free range poultry. Reduction potential: 20-90% (Bittman et al., 2014). Cost: 0-20 €³¹ (Bittman et al., 2014; Montalvo et al., 2015).</p>	<p>All countries have applied measures for low housing emissions at varying degree. Large pig and poultry farms are regulated through the Industrial Emissions Directive (IED) applying Best Available Techniques (BAT) Reference document (BREFs) developed under the IED, see Table 6.</p>	<p>New or expanding housing must comply to emission standards. Standards vary with distance to protected natural areas. In practice this will require technologies that reduce emissions, e.g. solid floors, frequent removal of manure, manure cooling or acidification or air purification (see below).</p>	<p>"Focus on Nutrients" inform farmers about measures for low emission housing.</p>	
<p>Air purification Options to treat the air ventilated from animal housing, e.g. biological air cleaning or acid scrubbers to treat the exhaust air. Air purification filters are not suitable in all animal buildings, e.g. in buildings with natural ventilation. This measure could be increased by setting rules and demanding air purification in conjunction with permissions for new or expanded operations. Reduction potential: About 60% (assuming about 20% of the ventilation capacity). (NIRAS, 2009). Cost: 2.5-17 € (NIRAS, 2009).</p>	<p>This is an expensive measure which is not broadly used in the Nordic countries.</p>	<p>Air purification may be required to comply with emissions standards for new housing, particularly for pig farms, both with regard to ammonia loss and odour. However, it is not a very common technology even in Denmark.</p>	<p>Swedish animal buildings often have natural ventilation, which is not suitable for air purification filters.</p>	<p>The technique has been implemented on a voluntary basis by a few agricultural producers.</p>
<p>Covered storage Reduce the exposure of stored manure to air, e.g. concrete lid, plastic floating sheet, peat (see below), straw or natural crusts. Stricter regulations regarding cover of slurry, urine containers and also digested manure could be an effective measure. Reduction potential: 50-95% depending on type of cover (SBA, 2010). Cost: 0.5-5 € (SBA, 2010).</p>	<p>Danish regulations comprise e.g. minimum storage capacity, to comply with slurry close periods, no runoff from manure heaps and mandatory slurry tank covers. Covers can be natural crusts (dairy farming) straw crust (~50% of pig farms) or lids, typically of the "tent" type (~50% of pig production).</p>	<p>All livestock farms must have sufficient manure storage. For farms with > 100 animal units, minimum storage capacity is 8 to 10 months depending on animal type. In southern Sweden requirements for coverage of slurry and urine tanks apply. The majority of slurry stores in Sweden are covered (98% year 2013) (Statistic Sweden, 2014), hence the main emission reduction potential is to apply more effective covers than natural crusts.</p>	<p>All new slurry and dry manure storages must be covered and minimum storage capacity is 12 months.</p>	<p>A minimum storage capacity for 8 months is required, but no cover is required. 20% of storages in Norway are not covered (Bechmann et al., 2016b).</p>
<p>Using peat during storage of solid manure Advantages include more easily spread manure and a better housing environment and animal health. A disadvantage is the trade off with climate change effects and other environmental effects of increased peat extraction. This measure could be increased by providing information and counselling, to facilitate contacts with peat producers or by offering subsidies for agricultural producers using peat. Reduction potential: About 50% (SBA, 2010)</p>	<p>The use of peat as litter is very limited in the Nordic countries today.</p>	<p>Germundsson (2006) has estimated the use in Sweden to be about 200 000 and 300 000 m³ per year.</p>	<p>1.6 million m³ horticultural, bedding and environmental peat was produced in 2017 (Luke, 2018). Iivonen (2008) estimated that the average use of bedding peat in Finland is 1.2 million m³ year⁻¹.</p>	

Cost: About 0.5 € (SBA, 2010).				
Low ammonia application of manure Means to distribute manure to minimize surface exposure, e.g. shallow injection or direct incorporation, see Table 3. Reduction potential: 45-90% depending on type of manure and time after spreading (SBA, 2010). Cost: About 0.5-1 € (SBA, 2010).	The use of application techniques are enforced by regulations. There are set standards for which application techniques are allowed on which type of fields. Broadcasting has been banned since 2002 and there is also a ban on winter spreading of slurry for spring-seeded crops. Enforcement of these rules rests with the municipalities.	Nitrate sensitive areas have stricter regulations regarding when and how manure spreading must occur, and how quickly the manure should be incorporated into the soil. Subsidies may be provided for direct injection of manure but this is decided by the County Administrator Boards, hence differs within the country.	Manure must be incorporated within 24 hours after spreading, with a few exceptions (e.g. application on plants with a hose sprayer or over an entire area). Stricter regulations, i.e. quicker incorporation, apply on sections of arable land parcels with a slope of at least 15%. The application of manure and organic fertilizers in fields is prohibited from Nov 1 to Mar 31 (unless exceptional weather conditions have prevented the use of manure as fertilizer during the growing season). A subsidy for direct injection of slurry into the soil has been available in the RDP for Mainland Finland (2014-2020).	Subsidies are provided for band application and direct injection of manure. The spreading period is limited to Feb 15 th to Sep 1 st for surface application or Nov 1 st for incorporation.
Low emission application of urea fertilizer Refers to appropriate timing and dose of application. Ammonia emissions are reduced if urea is incorporated into the soil or if a urease inhibitor is used. Urease inhibitors reduce ammonia emissions by >30% (Bittman et al., 2014).	In Denmark, 10-20% of mineral N fertilizers is urea.	In Sweden, Norway and Finland, the use of urea in agricultural production is very low, but it may increase in the future if there is a change in price in relation to other fertilizers. Southern Sweden has regulations that urea should be incorporated into the soil within 4 hours.		
Acidification of slurry Lowering the pH of manure (either in housing or prior to application) reduces ammonia emissions. A disadvantage is that the development of biogas production is discouraged. Information activities and subsidies could be possible instruments to encourage the use of acidifying substances. Reduction potential: About 80% during storage and 70% during spreading (NIRAS, 2009). Cost: 3-14 € (NIRAS, 2009).	Adoption is estimated at 20% of the slurry based on contractor interviews but only 10-12% based on acid sales (Nyord, T., Aarhus University, Denmark pers comm., 2018).	Acidification of slurry is not broadly used in the Nordic countries, except for Denmark. This measure can be used only for slurry. Reducing pH of slurry is difficult to implement in some countries, as liquid manure systems are required (Rodhe et al., 2018).		

113 1) Includes expensive measures such as air purification.

114 The Task Force on Reactive Nitrogen (TFRN), a working group of the Convention on Long-
 115 range Transboundary Air Pollution (CLRTAP), has summarized a comprehensive listing of
 116 techniques to reduce ammonia emissions in the “UNECE Ammonia Guidance Document
 117 (UNECE, 2014; Bittman et al., 2014). These mitigation techniques are also summarized in the
 118 “UNECE Ammonia Framework Code” (UNECE, 2015). The TFRN has provided a short
 119 ranked list of priority measures for ammonia emission reduction, in evaluating options for
 120 revision of the Gothenburg Protocol Annex IX (Howard et al., 2015, UNECE, 2011):
 121 1. Low emission application of manures and mineral fertilizers to land.
 122 2. Animal feeding strategies (including phase feeding).
 123 3. Covers on new slurry stores.
 124 4. Farm N balance, i.e. strategies to improve N use efficiencies and reduce N surpluses.
 125 5. Low emission new (and largely rebuilt) pig and poultry housing.

126 These documents may serve as guidance in the Nordic countries to evaluate potential mitigation
 127 techniques. In Denmark (and partly in the other Nordic countries as well) at least number 1 and 3
 128 in the list above have already been implemented. Hence there are limited gains possible from
 129 these suggestions for the future.

130 In agreement with the guidance above, Grönroos (2014) concluded that the most cost effective
 131 abatement measures regarding reduction of ammonia emissions in Finland are low emission
 132 manure application techniques, feeding strategies and covered storages. Also in Norway, the use
 133 of low emission application techniques (e.g. band spreading) has been identified to be efficient

134 measures to reduce ammonia-emissions (Bechmann et al., 2016b). Emission reductions have
135 been estimated to be 1500-2000 tonnes N per year by changing the manure application method
136 from broad spreading to band spreading.

137 In Denmark, 89% of manure is collected as slurry (Birkmose et al., 2013), whereas the ratio of
138 slurry to FYM (Farm yard manure) is smaller in Norway, 70% (Statistics Norway, unpublished)
139 and Sweden, 62% (Statistics Sweden, 2017). In Finland, all cattle manure is collected as slurry,
140 and 78% of pig manure and 86% of poultry manure (Grönroos et al., 2017). In Denmark,
141 broadcasting has been banned since 2002, but in Finland and Sweden about 35% and 28% of the
142 slurry, respectively, is applied with broadcast spreading, while in Norway 88% of the slurry is
143 being applied using broadcast spreading (see Table 3). This clearly shows a potential to apply
144 more low emission application techniques to reduce emissions of ammonia, such as band
145 spreading and injection, particularly in Norway. In Sweden band spreading has increased steadily
146 during the past 15 years, and the Swedish Board of Agriculture (SBA, 2010) projects that it will
147 continue to increase steadily in the future, even without regulations.

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Table 3. Application techniques for slurry in the Nordic countries (%). Updated from Rodhe et al (2018).

Country	Broadcast spreading (%)	Band spreading (%)	Injection (%)
Denmark ¹⁾	0	85 ⁴⁾	15
Finland ¹⁾	35	34	31
Sweden ²⁾	28 ⁵⁾	68 ⁵⁾	4
Norway ³⁾	88	12	0

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- 1) Estimated by national experts
- 2) Statistics Sweden (2017).
- 3) Bechmann et al. (2016b).
- 4) Including 20% acidified slurry.
- 5) 24% of the surface spread manure (solid and liquid) is incorporated directly, 11% within 4 hours and 9% within 24 hours after spreading (Statistics Sweden, 2014).

156 2.2 Measures to reduce emissions of nitrous oxide

157 Agricultural soils and manure management are the dominant sources (about 60-90%) of
158 emissions of N₂O in the Nordic countries (Antman et al., 2015). Efficient use of N will
159 contribute to overall lower N application, which should generally yield lower N₂O-emissions
160 (Bakken and Frostegård, 2017). Table 4 provides an overview of measures to reduce emissions of
161 N₂O from the agricultural sector in the Nordic countries.

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164 **Table 4. Overview of measures to reduce emissions of nitrous oxide (N₂O) from agriculture in the Nordic**
 165 **countries. Updated from Hellsten et al. (2017).**

Measure	Implementation
Effective use of manure and fertilizers Efficient N use will contribute to overall lower N application and hence lower emissions of N ₂ O. The amount of manure should be adjusted to the need of crops. In a Nordic climate, spring application is more efficient than autumn application, but application on warm, wet soils should be avoided.	See Table 2.
Avoid porous crusts, e.g. straw Porous crusts during storage of slurry, urine and digested manure may increase the risk of emissions of N ₂ O (using e.g. a plastic sheet is better). However, it may depend on situation and sometimes a crust is better than no crust. Covering solid manure heaps with a plastic sheet may reduce emissions of N ₂ O (Hansen et al., 2006).	See Table 2.
Rapid incorporation of manure after application Likely reduces losses of N ₂ O. Some methods for low ammonia emission application of manure may increase emissions of N ₂ O, but from a holistic perspective it is still advantageous regarding greenhouse gases.	See Table 2 and Table 3.
Digestion of manure Anaerobic digestion does not result in significant N ₂ O production, while aerobic digestion (either as compost or as aerated slurries), will emit large amounts of N ₂ O. However, both potentially reduce N ₂ O emissions after application to soil, because digestion makes the nutrients more easily accessible for the plants. Emissions of N ₂ O can be reduced/avoided by applying a long digestion process, cooling the digested manure or collecting the gas.	See Table 5.
Catch crops Reduce nutrient leaching, and likely also reduces losses of N ₂ O (but may increase the use of pesticides).	See Table 5.
Spring tillage Spring tillage likely reduces losses of N ₂ O (as long as the soil is not compacted).	See Table 5.
Use of nitrification inhibitors Inhibiting nitrification of ammonium fertilizer will significantly reduce N ₂ O emissions. Potentially reduces emissions by 35% (Ruser et al., 2015).	In the Nordic countries, there are no subsidies and very limited use of nitrification inhibitors, though some use in Denmark. The limited use of urea and liquid N products is one of the reasons for the interest in inhibitors in Sweden.

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167 2.3 Measures to reduce nitrate leaching

168 Agricultural producers in the Nordic countries can get support for a number of measures to
 169 reduce nitrate leaching within the Rural Development Programs (RDP). Bechmann et al. (2016a)
 170 concluded that the agricultural mitigation measures targeting water management for agriculture in
 171 the Nordic countries have many similarities, despite natural and institutional differences between
 172 the countries. Table 5 provides an overview of measures to reduce nitrate leaching and level of
 173 implementation in the Nordic countries.

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Table 5. Overview of measures and costs (per kg N reduced to the sea) to reduce nitrate leaching in the Nordic countries. Updated from Hellsten et al. (2017).

Measure	Denmark	Sweden	Finland	Norway
Manure management Effective utilization of manure and slurry as well as closed periods of spreading is important to reduce nitrate leaching. Maximum N manure limits are set within the Nitrates Directive, see Table 6. Cost: 42-840 € (Agrifood, 2015).	Advisory services and education regarding storage and spreading of manure are available in each country. Denmark has stronger restrictions in N application compared with Sweden, Norway and Finland (see Table 2).			
Digestion of manure Makes the nutrients more easily accessible for the plants and therefore less nitrogen is leached to the aquatic environment (Sørensen and Duus Børgesen, 2015). However, during digestion of manure, ammonium and pH increases, which increases the risk of ammonia emissions during storage and spreading (Möller et al., 2008). Therefore it is important to cover the stores and use low emission applicators of digested manure.	About 7% of manure was digested in 2012. In 2020 the assumption is that this number will have increased to 19% (Jensen et al., 2015).	Biogas plants are being developed with support for investment. 41 manure digestion farm plants existed in Sweden in 2016 (SEA, 2017).	6% of pig slurry and about 1% of other manure is currently digested (Luostarinen et al., 2018). Investment support can be applied for construction of a biogas plant.	Subsidies are provided to manure used for biogas.
Catch crops A catch crop is grown between two main crops and takes up the plant nutrients left in the soil after harvest, hence reduces leaching. Cost: 1-3 € (Eriksen et al., 2014). If changes in the crop rotation are required the cost will be higher, 21-32 €.	Denmark has mandatory crop rotation plans e.g. requirements of 8-14% catch crop winter cover. If a farmer has a permit to expand the livestock husbandry, part of the permit can call for extra catch crops. Furthermore, Denmark has a scheme in which farmers can be subsidized for a hectare of catch crops as part of a compensation for increasing the N quotas and partly as implementation of the WFD.	Investment support (subsidies) is provided for catch crops.	Catch crops are supported and regulated within the Finnish Agri-Environmental Program.	Investment support (subsidies) is provided for catch crops.
Combined catch crops and spring tillage Reduce nutrient leaching during October to March. Spring tillage is associated with a lower risk of nutrient leaching than autumn tillage, but may increase the use of pesticides during the growing season. Cost: 10 € (SLU, 2010).	Tillage is banned in autumn before spring sown crops the following spring, unless you are sowing a winter crop or a catch crop. Tillage is prohibited after harvest and is permitted again from Feb 1 (on sandy soils) and from Oct 1 (on sandy clay and organic soil), and from Nov 1 (on clay soil).	Investment support is currently provided both for catch crops and spring tillage.	Both catch crops and reduced tillage are supported within the current Agri-Environment Program.	Subsidies are given for catch crops in combination with spring tillage.
Wetlands Re-establishment and construction of wetlands may act as N (and P) traps. Cost: 4 € (Eriksen et al., 2014), 5-8 € (SLU, 2010).	Investment support is provided for the construction of wetlands in Denmark, Finland, Norway and Sweden, Denmark plans to build many constructed wetlands to reduce leaching.	In Sweden, investment support is provided for the maintenance of wetlands.		In Finland, investment support is provided for the maintenance of wetlands.
Controlled drainage The farmer controls the runoff from arable land by adjusting the ground water level using installed wells. Hence N leaching to surface water can be reduced.		Investment support is provided to controlled drainage in Sweden and Finland. In Finland, controlled drainage has been seen as a good measure to reduce both leaching and emissions of N ₂ O from peat soils while Denmark has had mixed experiences regarding the effectiveness of controlled drainage. This is likely due to the different soil conditions that apply.		
Extensive ley/cultivated grasslands Contribute to reduced plant nutrient losses and erosion.	Investment support is provided to low N grasslands in environmentally sensitive areas.	Farmers in areas dominated by cereal production can receive compensation for perennial grassland within the RDP as a way to reduce N leaching and increase biodiversity.	Environmental management grasslands are part of the Agri-Environmental Program.	

179 Manure management, i.e. effective storage and utilization of organic fertilizer, is important to
 180 reduce nitrate leaching. For instance, optimized N fertilization contributes to overall lower N
 181 application, which will reduce N leaching. Timing and weather conditions during application is

182 also important. Fertilizing with manure in the autumn mainly means that a large portion of the N
183 can be lost through leaching, rather than fertilizing the crop, unless catch crops are present. Catch
184 crops (typically *Lolium*, other grass species, or fodder radish) can reduce excess leaching after
185 autumn fertilization, however, they must be sown sufficiently early and require relatively mild
186 weather conditions in order to develop properly. In a Nordic climate such conditions are not
187 present every year and therefore the effect of catch crops is highly variable between years.
188 Restricting application periods is a more effective approach to prevent N from leaching,
189 particularly in a wet climate.

190 In Denmark, strict regulations of the use of N fertilizers have contributed to reduced N leaching
191 from agricultural areas (Windolf et al., 2012). Denmark has set minimum standard utilization
192 demands for manure in the guidance documents for fertilizer management plans (EPA, 2017). In
193 addition to regulation for use of N fertilizer, catch crops and wetlands are some of the most cost
194 effective measures to reduce nitrate leaching in Denmark (Eriksen et al., 2014).

195 In Norway, there is a potential in some areas for more efficient use of N fertilizers at a low cost,
196 resulting in a lower N surplus (Bechmann et al., 2014). Suggested measures include: i) improved
197 nutrient rates based on average yield instead of highest expected yield as a basis for N application,
198 ii) split N application, iii) precision N application and iv) improved efficiency in use of manure
199 (Bechmann et al., 2016b). However, no legal regulations for these measures exist.

200 Also in Sweden, manure application technique and timing of manure spreading are important
201 means recommended to reduce N leaching (Andersen et al., 2014). By the end of the 1990's,
202 legislation was introduced on when, and how fast, manure should be incorporated into the soil.
203 About 24% of surface spread manure (both solid and liquid) is directly incorporated into the soil
204 (Statistics Sweden, 2014). Direct incorporation may increase N leaching, since there will be more
205 N available for leaching, but it reduces P loss in surface runoff and also ammonia emissions,
206 which is the main purpose. Reduced losses by immediate incorporation should be coupled with
207 lower application rates of manure and mineral fertilizers. Reduced tillage may increase leaching
208 via micro pores and has been used as a measure to reduce N leaching in Sweden (Andersen et al.,
209 2014). Farmers in Sweden can apply for support within the Rural Development Program for
210 postponing plowing from autumn to spring. Subsidies to encourage precision farming, using N-
211 sensor techniques to apply optimum levels of nutrients from mineral fertilizers are applied in
212 some counties in Sweden.

213 In Finland, the Nitrates Directive is implemented in the whole country, see Table 6. It sets
214 maximum annual application rates of soluble N (kg ha^{-1}) for various crops. From 1st September
215 the amount of soluble N in farm animal manure and organic fertilizer products may not exceed
216 35 kg ha^{-1} . The Nitrates Directive also regulates the timing and type of spreading. The voluntary
217 Agri-Environment Program, which has been adopted by the majority of farmers, sets slightly
218 lower application maximums than the Nitrates Directive. Moreover, the voluntary program
219 includes subsidies for crop cover (reduced tillage, stubble, grass and winter crops) during autumn
220 and winter that contribute to lower N losses to ground and surface waters. Recently, incentives to
221 plant cover crops were applied in some areas with high potential to reduce N leaching (Valkama
222 et al., 2015).

223 Table 6. Summary of the most important EU Directives regarding nitrogen and agriculture.

NECD	National Emissions Ceilings Directive	Sets emission targets (e.g. for ammonia) until 2020 and 2030.
ND	Nitrates Directive	Sets maximum N manure limits in nitrate vulnerable zones, for the NO ₃ concentration to be below WHO standards.
WFD	Water Framework Directive	Sets standards for N abatement in watersheds, to meet defined water qualities in streams, lakes and coastal waters, especially critical for regions that border the sea.
IED	Industrial Emissions Directive	Regulates large pig and poultry farms (>40 000 places for poultry, >2 000 places for production pigs (over 30 kg), or >750 places for sows). Best available techniques (BAT) should be applied to reduce emissions, with guidance provided by published BAT Reference documents (BREFs)

224 3. Progress in implementing nitrogen management 225 actions in the Nordic countries

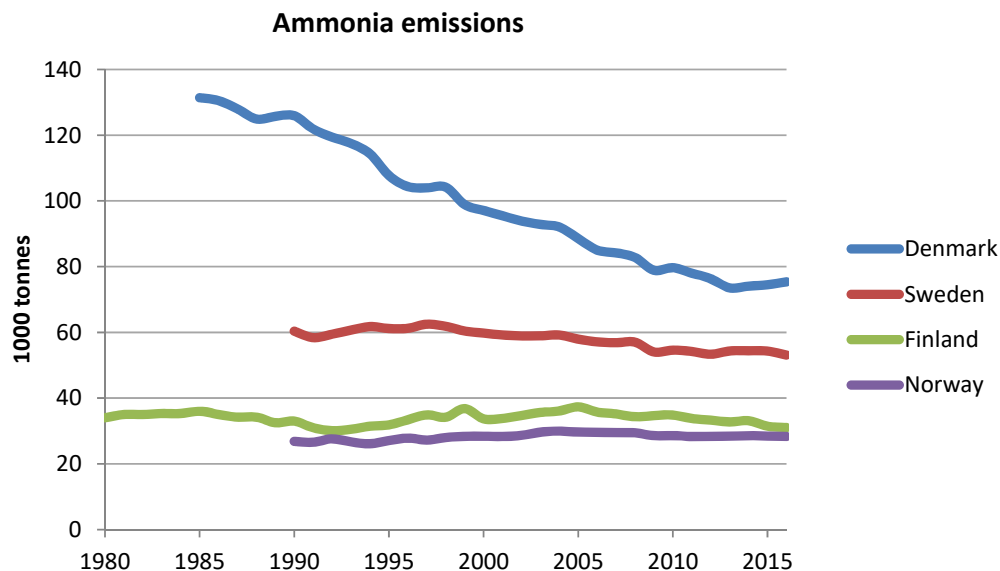
226 The dominant policy instruments to reduce N losses from agriculture in the Nordic countries
227 today consist of rules and regulations, market-based regulation, subsidies or information and
228 voluntary action. Bechmann et al. (2016a) noted that, although there are many similarities
229 regarding agricultural mitigation measures implemented in the four countries, there are large
230 differences between the instruments used in the agricultural policy. In Denmark most of the
231 measures have been legislated, but with a recent shift towards a more geographically
232 differentiated and voluntary framework (Dalgaard et al., 2014). In Finland and Norway, regionally
233 adapted incentive-based policies are used and agricultural environmental policies tend to have
234 focused more on the problem of P, especially in Norway. In Norway, the legislation on manure
235 management, the Regional Environmental Program and the subsidies for environmental
236 investments, successfully motivates farmers to implement measures, mainly aimed at minimizing
237 P losses. The Finnish “Agri-Environment Program” payment system has succeeded in enlisting
238 90% of farmers to the program. It has reduced soil P status and thereby the risk of P losses from
239 fields while increased crop cover during winter has also reduced N leaching. The voluntary
240 Swedish advisory program “Focus on Nutrients”, running since 2001, has helped reduce N
241 leaching and decreasing N transport from agricultural land to rivers (Fölster et al., 2012;
242 Agrifood, 2015). The campaign focuses on increasing nutrient management efficiency by
243 increasing awareness and knowledge using techniques described above. The core of the
244 information campaign is education and individual on-farm advisory visits. “Focus on Nutrients”
245 also provides information on a webpage (www.greppa.nu).

246 In the other Nordic countries, short-lived agri-environmental projects have targeted geographical
247 areas. For example, in south-west Finland, two agri-environmental projects TEHO (2008-2011)
248 and TEHO Plus (2011-2013) (Launto-Tiuttu et al., 2014), as well as in southern Finland JÄRKI
249 (2009-2013 and 2014-2018) have been running (www.jarki.fi). In Norway similar approaches have
250 been implemented for specific areas, e.g. the lake Vansjø and Skas-Heigre catchments, where
251 contracts with farmers on environmental behavior were introduced together with farm visits.
252 However, the main focus was on P rather than N. In Norway, the webpage “Tiltaksveilederen”
253 (www.nibio.no/tiltak) present information on mitigation measures to reduce nutrient losses from
254 agriculture. In Denmark, the new watershed advisory scheme and the work with water councils
255 (Graversgaard et al., 2016) are other examples of information campaigns. Similar actions were
256 also undertaken in Denmark in the 1990’s in campaigns called “Gylle er guld” (“manure is
257 money”).
258

259 3.1 Ammonia emissions

260 Ammonia emissions in the Nordic countries (Figure 1) mainly originate from agriculture (about
261 94% in Denmark (Nielsen et al., 2018), 92% in Norway (Statistics Norway, 2018), 91% in Finland
262 (MAF, 2018) and 88% in Sweden (SEPA, 2018).

263 Denmark has had the largest reduction in emissions of ammonia by about 40% between 1990
264 and 2013 (Nielsen et al., 2018). During the same time period, the reduction in Sweden was 12%,
265 and in Finland 11% (SEPA, 2018; MAF, 2018). In Norway, ammonia emissions have even
266 increased by 6% since 1990 (Statistics Norway, 2018). In Sweden, the reduction in ammonia
267 emissions is mainly a result of decreased livestock numbers, reduced use of inorganic fertilizers
268 and a more effective agricultural production (SEPA, 2018). At the same time, meat consumption
269 and meat import has increased (SBA, 2013b), hence in principle the ammonia emissions (and also
270 other related nitrogen impacts such as contamination of water) have been transferred elsewhere.
271 After the 23 year reduction in ammonia emissions in Denmark, emissions are no longer
272 decreasing (since 2013, see Figure 1). Furthermore, projections, based on assumptions on future
273 policies and market development, indicate relatively small emission reductions in the coming
274 years (Nielsen et al., 2018). It is therefore clear that additional action and incentives to reduce
275 ammonia emissions are necessary to stimulate further reductions.



276
277 **Figure 1. Ammonia emissions (thousand tonnes) in Denmark, Sweden, Finland and Norway during 1980-2016.**
278 **Source: Nielsen et al. (2018); MAF (2018); SEPA (2018); Statistics Norway (2018).**

279 3.2 Nitrogen deposition

280 The nitrogen deposition in the Nordic countries has been reduced by about 25-30% since the
281 1980's (Ellermann et al., 2013; Ferm et al., submitted; Karlsson et al., 2018). Nitrogen deposition
282 derives both from reduced nitrogen (NH_x) i.e. mainly ammonia emissions, and from oxidized
283 nitrogen (NO_x) i.e. from fossil fuel combustion. Agricultural N policies have mainly affected
284 ammonia-based emissions (and depositions), hence only a small proportion of the total N

285 depositions. The remaining part, (primarily NO_x-emissions) derives mainly from road transport.
286 In the EU, emissions of NO_x are about twice as large as emissions of ammonia (EEA, 2018).

287 In Denmark, both measurements and model calculations show a decrease in N deposition of
288 about 25% from 1989 to 2009 (Ellermann et al., 2013). N deposition has also decreased in
289 Sweden. A reconstruction of old measuring series in Sweden since 1955 indicates that the wet
290 deposition of N (both nitrate and ammonium N) culminated in the mid-1980's (Ferm et al.,
291 submitted). Since then, the wet depositions of both ammonium and nitrate have decreased by
292 about 30%.

293 The measured total N deposition (nitrate and ammonium N) to coniferous forests in Sweden has
294 decreased by 27% from 2001-2016 (Karlsson et al., 2018). During this time period, NH₃-
295 emissions in Sweden have been reduced by about 10%, while NO_x-emissions have been reduced
296 by about 36%, so the majority of the N-deposition reduction is expected to be derived from
297 NO_x. During the same time period, Finland has not shown the same decreasing trend in N
298 deposition (Vuorenmaa et al., 2018). The regional scale annual total N deposition in Norway is
299 estimated to have been in the order of 177 ktonnes during 1978-1982, and was reduced to about
300 144 ktonnes in the period 2012-2016, a reduction of about 25% over nearly 35 years. The
301 corresponding trend in reduced N deposition was from about 93 thousand ktonnes to 73
302 thousand ktonnes (22% reduction) (Aas et al., 2017).

303 3.3 Nitrate leaching to the aquatic environment

304 Denmark has had the highest reductions when it comes to N leaching to the sea. During the past
305 25 years, average N-surplus in Danish agriculture has been reduced from almost 200 kg N ha⁻¹ yr⁻¹
306 in the beginning of the 1990's to about 80 kg N ha⁻¹ yr⁻¹ (See Figure 2). As a result, the N load to
307 marine waters has been reduced by 50% and the previously increasing trend of N content in
308 groundwater now shows a decreasing trend (Hansen et al., 2011; Windolf et al., 2012). This
309 reduction has mainly been accomplished by restricting use of N fertilizers which give farmers
310 incentive to improve N use efficiency. Since the mid-1980's, a series of policy action plans to
311 mitigate losses of N have been implemented in Denmark. However, despite large reductions in
312 nitrate leaching, the targets set for the Water Framework Directive (see Table 6) are sometimes
313 exceeded, hence further reductions are still needed.

314 In Norway, the estimated losses of N from agricultural areas to marine waters increased by 11%
315 from 1990 to 2011 (Selvik et al., 2012). In Norway, the main focus has been on mitigation
316 measures reducing P losses, for instance measures targeted to erosion, e.g. reduced soil tillage. P
317 is closely related to erosion and therefore these measures will affect P.

318 In Sweden, inorganic N leaching from agricultural land has decreased since the 1980's.
319 Monitoring stream water in 65 small catchments dominated by agriculture, show that inorganic N
320 leaching from agricultural land has decreased between 35-60% during a 20-year period (1991-
321 2010) in southern and central Sweden (Fölster et al., 2012). The leaching reductions were greatest
322 in those regions where the most extensive N mitigation measures had been implemented, i.e. the
323 introduction of catch crops, increased areas of grassland, improved manure management, more
324 winter cereals and less spring cereals.

325 In Finland, the N load from agriculture to waters has been calculated from long term
 326 measurements, showing only a marginal decrease in recent years, despite considerable reductions
 327 in fertilizer use and N field balances (Rankinen et al., 2016). The N balance has been reduced by
 328 40%, from 78.7 kg ha⁻¹ (1995) to 47.4 kg ha⁻¹ (2016) (Luke, 2018). These values represent average
 329 values for the whole country, hence in more intensive areas in south-western Finland in drainage
 330 basins of the Archipelago Sea the N load from agricultural land is higher than this.

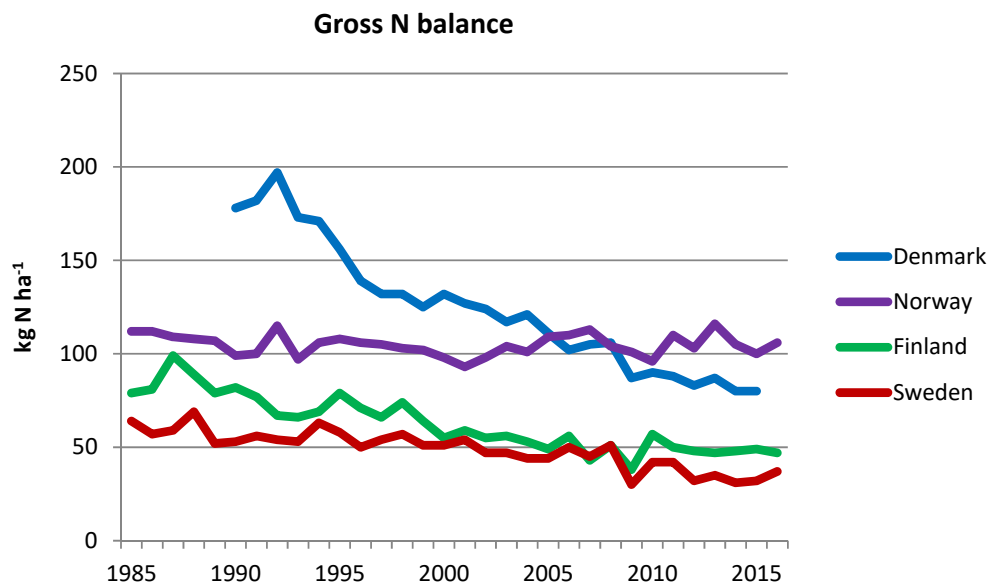
331 3.4 N surplus

332 The gross N balance, i.e. the potential surplus of N on agricultural land, is a means to assess
 333 nutrient management and efficiency in agriculture. It is estimated by calculating the balance
 334 between N inputs (fertilizers and manure, atmospheric deposition, biological fixation and seeds
 335 and planting material) and N outputs (fodder/grazing and crop harvest) from the agricultural
 336 system per hectare of agricultural land. A surplus indicates potential environmental problems,
 337 while a deficit may indicate a decline in soil nutrient status.

338 Denmark and Norway currently have a higher N surplus compared with Sweden and Finland, see
 339 Figure 2. Although Norway has the highest N surplus per ha, the agricultural area in Norway is
 340 about 1/3 of that of Denmark and Sweden and almost 1/2 that of Finland, therefore the total N
 341 surplus (from the whole country) is about twice as big in Denmark compared with the other
 342 Nordic countries, see Table 1.

343 N surplus has decreased in Denmark, Finland and Sweden since 1990, particularly in Denmark
 344 (by more than 50%). Despite large reduction in N surplus, Denmark has matched increasing
 345 productivity of other European countries (Kijek et al., 2015), hence demonstrating that there was
 346 room to improve environmental quality without sacrificing productivity.

347



348
349

Figure 2. Gross N balance (kg N per ha of agricultural area), 1985-2016. Source: Eurostat (2018).

350 4. Nitrogen challenges

351 4.1 Compliance with the NEC-directive

352 Through the EU National Emissions Ceilings (NEC) Directive, Denmark has committed to
 353 reduce ammonia emissions by 24%, Finland by 20% and Sweden by 17% until 2030 (compared
 354 with the base year 2005) (EEB, 2017), see Table 7. Norway is not committed to the NEC-
 355 Directive and has had the smallest emission reduction among the Nordic countries, 4% since
 356 2005 and even an increase of 6% since 1990, see Table 7.

357

358 **Table 7. Ammonia emissions (ktonnes) 1990, 2005 and 2016 (based on data in Figure 1) and predicted**
 359 **emissions in 2030 if the NEC-target for 2020 and 2030 is to be fulfilled. For 2016 also the emission change from**
 360 **1990 and 2005 is shown.**

	1990	2005	2016	change since 1990 / 2005	2020* NEC-target	change since 2005	2030* NEC-target	change since 2005
Denmark	126	89	75	-40% / -15%	59	-33%	67	-24%
Sweden	60	58	53	-12% / -8%	49	-15%	48	-17%
Finland	35	35	31	-11% / -11%	28	-20%	28	-20%
Norway	27	30	28	+6% / -4%	-	-	-	-

361

362

*The NEC-target is stated as a reduction percentage from year 2005. Here we provide the emission based on the emission value for year 2005 from Nielsen et al. (2018), SEPA (2018), MAF (2018) and Statistics Norway (2018).

363 In Denmark, emission reductions relative to 2005 are predicted to reach 18% by 2020 and 20%
 364 by 2030 (Nielsen et al., 2018). Hence, target reductions (-24%) will not be reached until 2030.
 365 The decreasing emissions are primarily expected from manure management, especially from the
 366 pig industry, mainly due to implementation of emission reducing technology in livestock housing
 367 systems. This is, however, partly counteracted by an expected increase in the use of mineral
 368 fertilizers. Interestingly, the largest absolute decrease in ammonia emissions in Denmark is
 369 predicted from bioenergy based local district heating systems and wood or pellets based heating
 370 systems in residential homes.

371 In Finland, agricultural ammonia emissions are expected to be about 29.6 ktonnes in 2020 and
 372 27.5 ktonnes in 2030. Hence according to the projections, the NECD-target for 2030 will be
 373 achieved.

374 In Sweden, ammonia emissions have been reduced by 8% since 2005, which is only half way to
 375 the reduction target for 2030 (17%). A gradual transition from systems with solid manure to
 376 slurry systems, with 62% slurry systems for cattle and pigs (Statistics Sweden, 2017), has resulted
 377 in reduced ammonia losses. This trend is expected to continue. However, unless livestock
 378 numbers are reduced, even further measures are needed, e.g. lowering the crude protein in fodder
 379 further or use more efficient covers for slurry compared with natural crusts. This would require
 380 increased advice or stricter legislation regarding feeding and housing conditions. In Sweden,
 381 feeding is increasingly adapted to the individual animal with the help of data collection with
 382 sensors, a trend that is likely to cut emissions of ammonia in the future.

383 In Norway, manure spreading accounted for 86% of the ammonia emissions from the
384 agricultural sector, whereas mineral fertilizer accounted for 9% (Bye et al., 2017). In Sweden, by
385 comparison, manure spreading only accounts for 33% of the agricultural emission, whereas
386 mineral fertilizers are at about the same level as in Norway (10%). The dominating method for
387 manure spreading in Norway is broadcast spreading (see Table 3), which contributes to the high
388 emissions of ammonia. This clearly shows that changing into low emission spreading techniques
389 have a potential to cut emissions. Since 1990, ammonia-emissions from manure in Norway have
390 increased by 14% (Bye et al., 2017). Ammonia-treatment of straw has decreased causing less
391 ammonia emissions from this source (Bye et al., 2017).

392 **5. Policies to reduce nitrogen losses from agriculture** 393 **– The way forward**

394 The pressure to reduce N losses from agriculture has been increasing in the Nordic countries.
395 Actions related to the WFD, the Nitrates Directive and the designated nitrate vulnerable zones
396 (EC, 2018) have a high priority in all four countries. The WFD is primarily target (output)
397 oriented, toward the effect in the water environment, while the Nitrates Directive is primarily
398 input oriented, limiting the use of manure in nitrate vulnerable zones, see Table 6. Furthermore,
399 Denmark, Sweden and Finland are part of HELCOM (the governing body of the Convention on
400 the Protection of the Marine Environment of the Baltic Sea Area), where measures to prevent N
401 leaching have very high priority, because most of the countries have reduction conditions set in
402 the Baltic Sea Action Plan.

403 Failure to comply with the NEC-directive and occasional exceedances of targets set for the WFD
404 show that clearly, there is a need for further reductions in the Nordic countries, and further focus
405 on working with farmers and other relevant actors to reduce N emissions and increase N
406 efficiencies are needed throughout the whole production chain.

407 Since the countries have different priorities and strategies regarding agricultural N flows and
408 mitigation measures, the way forward is different. Denmark has achieved substantial reductions
409 of N input, while at the same time maintaining and even increasing agricultural production value,
410 in particular in relation to a more and more N efficient livestock production. Between 2007 and
411 2013 Denmark increased its agricultural total factor productivity by 3.2%, Finland by 1.9% and
412 Sweden by 0.2% compared with 0.1% growth as an average for the EU countries (Kijek et al.,
413 2015).

414 In Denmark, initial agricultural measures were successful and effective because they were cost
415 effective and in many cases beneficial for the farmer. Sweden, Norway and Finland may not yet
416 have picked all the low hanging fruit, for instance when it comes to low ammonia application
417 techniques, and therefore have a potential to reduce more N losses from agriculture at a
418 reasonable cost. Today there are many measures available, but these measures are not always
419 applied, and the reasons for not applying these measures need to be identified and further
420 investigated. Wreford et al. (2017) have identified two main approaches to remove barriers:

421 1) Revision of agricultural policies that prevent the objectives of the aim (e.g. a more N
422 efficient agriculture).

423 2) Introduction of targeted initiatives to remove the most important barriers.

424 Agricultural producers may be facing long term investment costs (maybe > 20 years) from
425 implementing abatement measures, hence availability of funds could help to mobilize change and
426 overcome economic barriers. In Norway for instance, voluntary measures consist of investment
427 support and subsidies, to establish sedimentation ponds and wetlands.

428 5.1 More stringent regulations, or not?

429 Agricultural abatement measures should not be too expensive to the farmers, and should ideally
430 even pay for themselves, e.g. through advisory efforts that increase the utilization of livestock
431 manure and thereby obtain a reduction in the cost of mineral N fertilizer due to savings of N
432 within the farming system. For instance, improved nutrient management planning, accounting for
433 plant available of N in manure and based on average yield instead of maximum yield on a field,
434 could be an easy way to reduce N application with low cost for agricultural producers (e.g.
435 Bechmann et al., 2016b). It is important to communicate and promote existing techniques to
436 agricultural producers who have not yet adopted them.

437 Farmers and their organizations generally prefer voluntary approaches compared with
438 regulations. Some farmers may be interested in implementing measures to reduce environmental
439 problems, even if it is costly. Hence providing information and knowledge through advisory
440 efforts is important. However, other farmers may be reluctant to change from traditional
441 practices and voluntary actions may result in very slow change.

442 Important success criteria for changed farming behavior from "Focus on Nutrients" in Sweden
443 have been voluntary measures and repeated farm visits, relating to how measures will influence
444 farm economy (positively or negatively) and feedback to agricultural producers regarding the
445 environmental progress (e.g. through the press) to make the farmers proud of their achievements.

446 Sutton et al. (2018) concluded that a solely voluntary and economic approach is unlikely to
447 promote the necessary changes needed to meet the ammonia emissions ceilings in the NEC
448 Directive for 2020, and that additional regulation will be necessary. For instance, Norway has
449 focused on P more than N, hence there may be a need to adjust the regulatory framework to
450 reduce N losses from agriculture further. For instance, Norway needs to have more focus on the
451 use of N fertilizer, i.e. a balanced N application.

452 The only country to achieve major emissions reduction among the Nordic countries, Denmark,
453 had achieved it by a regulatory approach. However, it is unlikely that other countries with
454 significantly lower animal density could reduce losses to the same extent solely by means of
455 legislation. In Denmark, regulations have been an increased burden for farmers, and recently
456 there has been a shift towards a more voluntary framework.

457 Engaging with relevant stakeholders, such as farmer's associations, to assess required changes and
458 finding suitable solutions and mitigation measures can be useful to prepare the way for
459 mandatory measures. "Focus on Nutrients" in Sweden has been a good framework to
460 communicate knowledge and information and may therefore already have built a good basis for

461 further development and acceptance of mandatory measures among Swedish farmers. The
462 Swedish Board of Agriculture provide some examples of potential mandatory measures in
463 Sweden, e.g. that the current manure management regulations could be extended also to include
464 digested manure, more efficient covers and an expansion of the geographical area for regulations
465 on manure application (SBA, 2010). Another example could be to further regulate urea and slurry
466 application in Sweden. On the other hand, OECD (2018) recommend that Sweden should reduce
467 administrative costs by simplifying agricultural regulations (regarding the environment, animal
468 and crop health, and animal welfare) that go beyond EU regulations. This message indicates that,
469 from a European perspective, the legislative burden is already high and should be coordinated
470 and simplified for the convenience of farmers.

471 In all Nordic countries, there is a trend towards larger farms that may be more profitable, while
472 small farms are gradually disappearing. Currently large pig and poultry farms are regulated
473 through the Industrial Emissions Directive (IE Directive), applying Best Available Techniques
474 (BAT) to reduce emissions, with guidance provided by published BAT Reference documents
475 (BREFs) (Santonja et al., 2017). If current trends are extrapolated into the future, it is likely that
476 most poultry and pork will be produced on IED-farms in the Nordic countries. Large cattle
477 farms are not included in this regulation. Considering that there is an increasing number of
478 industrial-scale cattle farms, Sutton et al. (2018) highlighted the opportunity to include also cattle
479 farms in the regulations to follow BAT.

480 Another trend regarding agricultural policies in the Nordic countries is that they are likely to
481 move more towards geographically targeted policies. Sweden and Norway already have stricter
482 rules and regulations in some parts of the country (in nitrate vulnerable areas according to the
483 Nitrates Directive), hence has adapted regionally targeted policies. Denmark plans to bring this
484 concept of region specific solutions even further. A new agricultural legislative package will target
485 measures according to site specific characteristics, e.g. based on targets for N loading to specified
486 inshore water. From August 2019, Danish farmers may therefore have different management
487 restrictions depending on e.g. soil type and in which water catchment their farm is located (EPA,
488 2017). Reducing environmental impact in the most sensitive areas is important. However, Sutton
489 et al. (2018) noted that additional action in “hot spot” areas to maximize the environmental
490 benefits typically offer smaller contribution to total emission reduction.

491 5.2 More efficient use of manure and mineral fertilizers

492 Norway, having the highest average N-surplus among the Nordic countries (see Figure 2),
493 indicates a need to have more focus on the use of N fertilizer, i.e. a balanced application. Norway
494 has not regulated fertilizer N rates (except for the maximum amount of livestock manure to be
495 applied, 170 kg N ha⁻¹, in the nitrate vulnerable zone). In Sweden, there is currently an exciting
496 development in precision agriculture, using satellite images together with vegetation maps to
497 adjust N rates to crop needs.

498 McCrackin et al. (2018) concluded that manure is often not being used efficiently in the Baltic
499 region, particularly in countries with a high livestock density. However in Denmark, the Nitrates
500 Directive limits the amount of pig manure-N that can be applied to arable land. Less than half of
501 Danish pig farms have enough agricultural land to comply with these limits, and therefore, farms

502 must rent additional land or have other farms take care of the excess pig manure (Willems et al.,
 503 2016). Redistribution of manure from animal-dense areas to crop-producing areas may therefore
 504 be important to increase manure use efficiency. In some parts of Finland for instance, manure is
 505 spread without consideration to efficacy, i.e. disposed rather than used. If manure is used more
 506 effectively, it can (partly) substitute costly and energy-demanding mineral fertilizers. However,
 507 transporting manure is energy intensive and may damage roads. Furthermore, the financial cost
 508 of moving manure is very much a concern and the price is dependent on the distance of
 509 transportation. Birkmose et al. (2015) has estimated the transportation cost of pig manure in
 510 Denmark at 1.3 Euro per ton (1 km), 1.9 Euro per ton (5 km) and 2.4 Euro per ton (10 km).

511 N-taxation may be a means to influence the supply of reactive N into the agricultural system.
 512 Sweden and Norway have had a tax on mineral fertilizers and recently a re-introduction of the tax
 513 has been discussed in both countries, see Table 8. The main reason for the re-introduction is the
 514 lack of effective policy instruments to reduce the supply of N through fertilization.

515 **Table 8. Comparison of N taxation on mineral fertilizers in Denmark, Sweden, Finland and Norway.**

Denmark	Sweden	Finland	Norway
N taxation is not implemented in Denmark, but there is a pesticide tax as well as a tax on P in fodder.	In Sweden, a tax on mineral N fertilizers was introduced in 1984 to reduce N pollution, but it was abolished in 2009 because it was considered to be ineffective. A reintroduction of the tax has been discussed in recent years.	In Finland, there has been no tax for fertilizer nutrients after joining the EU in 1995. Before that, a P tax in the beginning of the 1990's was able to efficiently reduce P fertilization.	Norway had a tax on mineral fertilizers (1988-2000). A reintroduction of the tax of 0.3 € per kg of N has recently been suggested to reduce emissions of N ₂ O (NOU, 2015:15).

516 In Sweden, the previous N tax only reduced emissions of N₂O by about 2% because the Swedish
 517 N efficiency was already high (KI, 2014). The N tax was abolished because it was considered to
 518 have little impact on the use of fertilizers, but also to increase the competitiveness of Swedish
 519 agriculture. When the N-tax in Sweden was abolished, the use of mineral fertilizers did not
 520 increase, probably because the price was unchanged due to a general price increase on N fertilizer
 521 on the world market (KI, 2014). Also in Norway, the effectiveness of the tax compared with
 522 other measures has been questioned (Bechmann et al., 2016b).

523 5.3 New innovation

524 Denmark has been a pioneer among the Nordic countries when it comes to utilize and develop
 525 knowledge and techniques to increase the utilization of N in manure, e.g. trailing hose slurry
 526 application techniques, acidification of slurry and phase feeding of livestock. In earlier versions of
 527 the UNECE Ammonia Guidance Document, slurry acidification was not considered a
 528 recommended method. However, considering the success across Denmark this recommendation
 529 was later revised. Today there are initiatives to identify possibilities and obstacles to implement
 530 slurry acidification in the Baltic Sea Region (Rodhe et al., 2018).

531 This highlights the importance of investment to develop new technological innovations of more
 532 efficient measures. Methods to improve precision farming, i.e. using satellite images and sensors
 533 to adapt the N input to the soil, are interesting areas for research. Furthermore, more research is
 534 needed regarding novel approaches to reduce N₂O emissions from agricultural soils, e.g. by
 535 increasing soil pH. Another example refers to technique development to improve the efficiency

536 of air scrubbers (to reduce ammonia emissions from animal housing) so that they can be more
537 widely used in the Nordic countries.

538 Modern technology to increase the utilisation of N in manure is important, but is not the only
539 solution to the problem. Overall good farming, i.e. precise farming, reduced soil compaction, pest
540 control etc. with modern technology is also important in order to produce more with less. In this
541 way higher yields with lower nitrogen losses and net greenhouse gas emissions can be obtained.

542 5.4 Integrated policy approaches

543 Due to the complexity of the N cycle and co-benefits and trade-offs with other pollutants and
544 effects, we recommend a holistic approach that covers the full N cycle to tackle the problem of
545 N losses from Nordic agriculture. Recently the German government has highlighted the need for
546 integrated policy approaches to N reduction to enable a holistic view of the total reactive N
547 balance, beyond sector specific reduction measures (GME, 2017). Ammonia experts have
548 concluded that (expressed as kg of N), abatement of ammonia emissions can be rather cheap,
549 compared with further abatement of NO_x (Reis et al., 2015). Hence, technical measures within
550 the agricultural sector are more cost effective compared with N reductions within other sectors
551 already subject to more stringent regulations.

552 In the Nordic countries, as well as in the rest of the world, increasing concern about climate
553 change has resulted in policy actions to combat emissions of greenhouse gases. It is likely that
554 future agricultural policies in the Nordic countries will include agricultural climate change
555 policies, which will probably also influence N management. In Denmark for instance, the overall
556 Danish Climate Policy Plan aims to achieve a 40% reduction in GHG emissions by 2020
557 compared with 1990 levels (The Danish Government, 2013). A holistic N policy approach can
558 offer the opportunity to also incorporate reduction of methane emission from agriculture (e.g.
559 Hellstedt et al., 2014, Dalgaard et al., 2015).

560 This study mainly focuses on technical measures to reduce N losses from agriculture. However,
561 we noted that technical measures may not be enough to reach the pollution targets, hence also
562 system change measures, such as reduction of food waste, increasing the overall efficiency in the
563 food chain, or promotion of consumption patterns with lower N footprints (e.g. Karlsson et al.,
564 2017; Ocké et al., 2017; Westhoek et al., 2015), may be needed. Leip et al. (2015) concluded that a
565 combination of technological measures to reduce N losses from agriculture, improved food
566 choices and reduced food waste is necessary in order to make significant progress in mitigating
567 environmental effects from N.

568 5.5 Recommendations on the way forward in the Nordic countries

569 The Nordic Governments should continue to consult relevant stakeholders, researchers and
570 farmer's associations on which measures to prioritize for two reasons:

- 571 - Finding the most efficient and feasible measures to implement, and
- 572 - having the support of the farmer's associations facilitates the process of implementing
573 mandatory measures.

574 It is equally important to influence attitudes in a general sense and in a specific sense like local
575 hotspots such as water quality. Before designing and implementing new agricultural policy, the
576 Nordic Governments should:

- 577 - Firstly, identify potential barriers to the implementation, and
- 578 - secondly, identify ways to tackle the barriers, e.g. through increased awareness and
579 knowledge among the farmers regarding the effect of the mitigation measure, or through
580 the availability of funds (subsidies).

581 It is important to pick low hanging fruits through use of the most cost effective mitigation
582 measures. First of all, N application rate and its timing should be in accordance with the plant
583 need and carrying capacity of environmental recipients. Also, the choice of application
584 technology can further reduce the risk of N losses into air and waters. This may require more
585 region-specific solutions and knowledge-based support with tailored information in combination
586 with further targeted subsidies or regulations.

587 The effect of N-taxation on mineral fertilizers should be further assessed to better understand the
588 effectiveness of a new N-taxation. Furthermore, investing in the development of new
589 technological innovations is important in order to develop the next generation of efficient
590 mitigation techniques.

591 System change measures, e.g. reduced food waste, improved food choices and efficiency in the
592 food chain would further contribute to reducing environmental effects from N. Finally, there is a
593 need to emphasize holistic approaches across the N cycle and also links to measures for climate
594 change.

595 **6. Conclusions**

596 The four Nordic countries are at different levels regarding agricultural N flows and mitigation
597 measures, and therefore they are facing different challenges and barriers. In Norway, focus has
598 been more on P than N. In Norway and Finland subsidies are widely used, whereas in Denmark
599 regulations have, until now, been the main form. In Sweden voluntary actions and information
600 campaigns are important.

601 It is evident that commitment to the WFD, Nitrates directive and the NEC Directive has had
602 effect. However, to reach the environmental goals by 2020 and 2030, different countries will have
603 to take different routes based on their actions in the past. A solely voluntary and economic
604 approach may not promote the necessary changes needed, hence also the regulatory framework
605 may need to be adjusted in order to reduce N losses from agriculture further.

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