

## EBAs' contribution to the Nutrient Action Plan

The Nutrient Action Plan for better management is a timely instrument that could address fertilisers shortages and provide guidance on environmentally and agronomically sound management techniques.

It should work as a coordination instrument and address nutrients across different policy areas (environment, circular economy, agriculture, food and diet, fertilisers, raw materials, climate change...) - cover nutrients and soil organic carbon and integrate existing policies and implementation guidelines to be operationalized by market actors and local/regional regulators. Nutrient recycling and sustainable digestate management have significant climate and environmental benefits that should be acknowledged (GHG emissions savings, SOC build-up and carbon sequestration). Clarification of objectives for resource recovery recycling and anaerobic digestion in the EU Urban Wastewater Treatment Directive and in the Sewage Sludge Directive should be covered while ensuring adequate protection against contaminants.

Through updating knowledge on long-term effectiveness, cost and feasibility of nutrient-loss mitigation actions in different farming systems by implementing proposed CAP FAST tools, having more comprehensive legislation and stronger financial incentives, the EU could address the affordability and competitiveness of recycled nutrient products.

We are hoping to see this public consultation yield results in regard to reconsidering the classification of certain materials and the definition of manure and manure by-products.

Under the current regulatory framework, organic fertilisers are unevenly put in competition with their chemical counterpart. With the current Nitrate Directives classifying manure by-products as manure and submitting them to the 170Kg/ha/year limit of Nitrate Vulnerable Zones, the pricing of processed manure and the environmental benefits it brings are affected in an unfair way and rendering the value of the end-product negative or null. The Nutrient Action Plan represents an opportunity to reduce the consumption of chemical fertilisers and better integrate the farming sector into a truly circular economy that can both sustain the production of quality food and create new sustainable income streams for financially vulnerable areas, by incentivizing them to recycle nutrients in a replacement to chemical fertilisers, reduce the imports of non-renewable resources, and valorise organic carbon.

With a proper revision of the legislative framework ensuring political stability and long-term commitments viability while being in line with the newest scientific evidence such as the SAFEMANURE criteria, the financial viability of the Farm to Fork targets for farmers can be ensured.