

Brussels, 11th March 2025

From:

Copa-Cogeca,
EBA - European Biogas Association,
CEMA - European Agricultural Machinery

To:

Jessika Roswall

Commissioner
Directorate-General for Environment, Water
Resilience and a Competitive Circular Economy
European Commission

Christophe Hansen

Commissioner
Directorate-General for Agriculture and Rural
Development
European Commission

Subject: Taking action on circular farming through RENURE approval

Dear Commissioner Roswall, dear Commissioner Hansen,

We welcome the Commission's commitment to support the uptake of circular fertilizers – RENURE – as announced in both the Vision for Agriculture and Food and the Clean Industrial Deal.

Using fossil-free, low-carbon, recycled nutrients to produce organic fertilizers will reduce external dependencies, increase competitiveness and accelerate the decarbonization pathway to a net-zero Europe. As such, allowing farmers to create and use RENURE contributes to food security and the European Union's open strategic autonomy. Increasing circularity in nutrient cycles will be to the benefit of the farmer, the environment and European society.

We stress the importance of translating visionary statements into concrete policy measures that are actionable for farmers and technology providers alike. Unfortunately, the Commission's draft Directive amending Council Directive 91/676/EEC as regards the use of certain fertilizing materials from livestock manure, published during the last mandate, has not yet led to such actionable outcomes.

First and foremost, we welcome the amendment as a step towards exemption of RENURE from the Nitrates Directive limit of 170 kg of nitrogen per hectare per year. However, the amendment falls short of unlocking the potential of RENURE and at several points diverges from scientific consensus and practical applicability.

Regrettably, the amendment is not fully aligned with the RENURE criteria developed by the Joint Research Centre. By laying down a limitative list of approved production methods ('processing treatments'), the draft amendment completely stifles innovation aimed at new, improved production methods – in direct opposition to Commission's ambitions concerning competitiveness. Furthermore, a new limitation of 100 kg N/ha/year from RENURE is proposed in the amendment. As the key characteristic of RENURE is that the products are or behave identical to synthetic fertilizer, no such limitation should be included. Other issues need also be addressed - for a fuller review of adjustments to the amendment that will allow farmers throughout the EU to improve the circularity of nutrients, we refer to our input to the consultation.¹

Considering the ever-increasing urgency of this topic, it is also regrettable that the Nitrates Committee has not been able to move the amendment forward during its past three meetings.

Considering the necessity for swift action, we therefore urge to you act upon both the Vision for Agriculture and Food and the Clean Industrial Deal by aligning the amendment with the JRC's recommendations in general and the principle of technological neutrality specifically and to conclude the legislative process as soon as possible.

Sincerely yours,



Anna Venturini
Policy Director
EBA



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Secretary General
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¹ Consultation input from: [Copa-Cogeca](#); [European Biogas Association](#); [CEMA](#)