**To: European Commission Executive Vice-President for the European Green Deal Frans Timmermans**

**Cc: Commissioner for the Environment Virginius Sinkevicius, Commissioner for Health & Food Safety Stella Kyriakides, and Commissioner for Agriculture Janusz Wojciechowski**

## Re: The Commission's new initiative for a Fertiliser Communication and the urgency of the Integrated Nutrients Management Action Plan

Brussels, 24th October 2022

Dear Executive Vice-President,

I am writing, also on behalf of the undersigned, about the Fertiliser Communication which the Commission is expected to publish next month. We are highly concerned by the process and aims of this initiative and urge you to ensure that all actions taken to support farmers through the current crisis are strongly embedded in a long-term vision for the sustainability and resilience of the sector.

In March 2020, the Commission announced in the Circular Economy Action Plan the development of an Integrated Nutrients Management Action Plan (INMAP), aimed at "ensuring more sustainable application of nutrients and stimulating the markets for recovered nutrients". This initiative was highly welcome and has become even more timely in the current crisis. Expected by end of 2022, it appears to have been delayed, which is highly regrettable, as **the INMAP provides the best framework for addressing the immediate issues relating to fertilisers as part of a strategic and holistic strategy** for balanced nutrient management.

The relevance of this separate and narrowly framed Fertilisers Strategy is therefore questionable and the process through which it is being developed, without any form of public or expert consultation, is problematic. This points to a short-term, kneejerk reaction which will fail to address the systemic issues surrounding fertilisers or the root causes of the difficulties facing farmers, notably Europe's addiction to fossil fuels and mineral fertilisers imports. Instead, **the European Commission should deliver the INMAP** before the end of the year as promised, through which it can provide an integrated approach to short- and long-term nutrients and fertiliser management; while delivering on the Farm to Fork Strategy targets.

Current nutrient flows in the EU surpass the planetary boundaries for a safe operating space by a factor of 3.3 and 2 for nitrogen and phosphorus respectively[1] with dire consequences for the environment and human health which ultimately jeopardise our long-term food security – including eutrophication, nitrate pollution of surface and groundwater including sources of drinking water, harmful air pollution, greenhouse gas emissions, deteriorating soil quality, and biodiversity loss. This can only be addressed by **strongly reducing inputs of nitrogen and phosphorus[2] as synthetic fertilisers or embedded in feed imports, and improving the efficient use and re-cycling of nutrients** already in the system, which requires a holistic policy approach aimed at a long-term, system-wide transition.

The EU's reliance on imports of N and P fertilisers and fossil gas for the manufacture of fertilisers is a key vulnerability and must be addressed fundamentally, not simply by shifting to imports from other countries[3] or injecting public money into a dying industry[4]. This would continue to expose farmers to volatile markets and geopolitical shocks, and consequently citizens to volatile food prices, and would be contrary to the

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[1] EEA Report No 1/2020: Is Europe living within the limits of our planet — European Environment Agency

[2] de Vries et al. (2017) Science of The Total Environment, Vol. 786, https://doi.org/10.1016/j.scitotenv.2021.147283

[3] Euractive 25 Aug 2022 Europe searches for alternatives in fertiliser supply battle

[4] ICIC news 4th October EPCA '22: European shut ammonia production unlikely to return – analyst

EU's zero-pollution ambition, climate targets, and biodiversity commitments. Studies have found that phasing out synthetic fertilisers use in the EU is realistic as part of a **transition to agroecological farming, accompanied by a cut in food waste and a shift to sustainable diets**.[5] This must be the direction of travel established clearly by the Commission to address the economic and environmental crises jointly.

Several of our organisations contributed to the recent public consultation on the INMAP, where we presented thorough evidence of the issues at hand and comprehensive recommendations for how the EU could achieve genuine strategic autonomy in nutrients management and ultimately food production (AEE, AirClim, EEB, ECN, IFOAM, FoE FR). We urge you to consider that input, and to steer clear of short-term solutions that will not support the necessary transition to a climate-neutral and circular economy. We would also appreciate an opportunity to discuss this with you in a meeting at your earliest convenience.

Yours sincerely,

Patrick ten Brink, Secretary General of the European Environmental Bureau

Co-signatories:

Lili Balogh, President, Agroecology Europe

Marko Reinikainen, Director, AirClim

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Stefanie Siebert, Executive Director, European Compost Network

Eric Gall, Deputy Director, IFOAM Organics Europe

Khaled Gaiji, President, Les Amis de la Terre / Friends of the Earth France

Ester Asin, Director, WWF European Policy Office

[5] See for example: IDDRI (2018) An agro-ecological Europe by 2050: multifunctional agriculture for healthy eating and Billen et al. (2021) One Earth perspective Vol 4:6, p. 839-850 https://doi.org/10.1016/j.oneear.2021.05.008