

**To:**

Teresa Ribera, Executive Vice-President of the European Commission for a Clean, Just, and Competitive Transition, Commissioner for Competition

Christophe Hansen, Commissioner for Agriculture and Food

Jessica Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Wopke Hoekstra, Commissioner for Climate, Net Zero and Clean Growth

Olivér Várhelyi, Commissioner for Health and Animal Welfare

Maroš Šefčovič, Commissioner for Trade and Economic Security

**CC:** Elisabeth Werner, Director General of DG AGRI;

Eric Mamer, Director General of DG ENV;

Brussels, 12 May 2026

**Subject: The EU Fertiliser Action Plan Must Herald the End of Fossil Input Dependency**

Dear Executive Vice-President Ribera,

Dear Commissioner Hansen,

Dear Commissioner Roswall,

Dear Commissioner Hoekstra,

Dear Commissioner Várhelyi,

Dear Commissioner Šefčovič,

As representatives of civil society, farmer organisations and academia we are writing to share our concerns ahead of the publication of the EU Fertiliser Action Plan. The ongoing US-Israel war on Iran and subsequent fossil and fertiliser price spikes are yet another reminder that European agriculture is highly vulnerable to external shocks beyond the control of farmers. The current industrial food system has been deliberately shaped around synthetic chemical inputs, creating a structural dependency that ties agricultural productivity to fossil fuel production, and which has pushed the EU [beyond its safe operating space for nutrients](#), as well as destroying much of Europe's soils and biodiversity and fuelling climate breakdown.

Nitrogen fertilisers are highly fossil fuel dependent, as their production relies on methane gas both as feedstock and energy source, tying their price tightly to that of fossil fuels. The EU imports around [90% of its gas](#) and [around 30% of its nitrogen fertilisers](#). When gas is particularly expensive, such as in 2022 after Russia invaded Ukraine, the share of nitrogen fertiliser imports rose to [around 45%](#). The EU's response to the 2022 price shock failed to increase the Union's autonomy, leaving our food system susceptible to volatile gas prices. At the same time, [Russia remains the EU's largest supplier](#), meaning the EU continues to contribute to Russia's war on Ukraine.

Despite this backdrop, the EU only seems focused on measures to improve the availability and affordability of fertilisers. This fails to address the root cause of the current crisis: the built-in dependency on synthetic fertilisers. Future shocks will continue to throw our food systems into crisis as long as farming is highly dependent on agrochemicals in general, and fossil-based inputs in particular.

Besides being a barrier to EU strategic autonomy, our agricultural system's fossil fertiliser dependence causes severe human health impacts and environmental challenges. These include water pollution and eutrophication (over a third of rivers, lakes and coastal waters are [reported as eutrophic](#) in the EU), biodiversity loss, deteriorating soil health, greenhouse gas emissions, ozone depletion and air pollution. A growing body of [research](#) has linked nitrate exposure to [colorectal cancer](#), thyroid disease, and neural tube defects.

The environmental impact is also staggering, with a recent [study](#) estimating the environmental and human health costs of nitrogen fertilisers in EU Member States at €70–320 billion per year. Such an amount suggests that the [social costs of nitrogen fertilisers in Europe now offset a large share of the gains](#) and that social benefits of reducing nitrogen fertiliser use would exceed private losses.

The triple crisis of biodiversity loss, pollution, and climate change is already threatening food production. Weakening environmental safeguards and cementing the reliance on synthetic inputs will only make this worse.

Solutions that do not rely on synthetic fertilisers already exist. Organic and agroecological farmers are paving the way for agricultural systems that minimise the use of chemical fertilisers, demonstrating that not only is it possible, it is also economically viable. By prioritising plant nutrition through the soil ecosystem and nutrient recycling, [organic farming relies on less external inputs](#), proving more resilient to recent crises. Scaling up these approaches, which also deliver public health and environmental benefits, requires political support.

While some short-term measures are necessary, they are insufficient to build a resilient model, both economically and environmentally. The EU now needs to act preventatively to break free from the fossil food system trap. Farmers who are not dependent on synthetic inputs should be better supported through concrete provisions that can lead the whole sector towards more resilient practices - and a truly sustainable future.

### **The Fertiliser Action Plan should prioritise**

- Supporting farmers to transition to low-input practices, particularly through agroecology and organic farming. Legume production for improved biological nitrogen fixation and crop rotations can be rapidly implemented on a wide scale and should be adequately rewarded through public policy.
- Upholding existing environmental legislation, in particular through continued and effective implementation and enforcement of the Nitrates Directive.
- Improving nitrogen use efficiency via a systemic approach, combining a broad shift to less nitrogen-intensive diets, reduced food waste, and more sustainable agricultural practices.
- Developing and subsidising regional biofertiliser production and use as part of a transition away from fossil-fuel based inputs. Ensure accessible, fair and transparent implementation.

Finally, we would like to stress the importance of civil society and rightsholders' participation in these discussions: impacted communities and agroecological and small- and medium-scale farmers' voices are crucial to ensuring the development of measures that will deliver on these objectives. We remain at your disposal for any questions and concerns, and welcome the opportunity to continue this discussion in more detail during a meeting.

Yours sincerely,

1. ActionAid International
2. Agir pour l'environnement
3. Agricultural and Rural Convention - ARC2020
4. Agroecology Europe
5. Andy Gheorghiu Consulting
6. Animal Advocacy & Food Transition
7. Armenian Women for Health and Healthy Environment (AWHHE)
8. Association Biom - BirdLife Croatia
9. Association For Promotion Sustainable Development

10. Basel Action Network
11. Bio Consom'acteurs
12. BirdLife Austria
13. BirdLife Europe and Central Asia
14. BREAD OF PEACE
15. Center for International Environmental Law (CIEL)
16. Changing Markets Foundation
17. Child Rights International Network (CRIN)
18. ClientEarth
19. Climate Action Network Europe
20. Coastal Watch Association
21. Community Action Against Plastic Waste (CAPws)
22. Compassion in World Farming
23. Consumers' Association of Penang, Malaysia
24. Corporate Europe Observatory
25. Deutsche Umwelthilfe e.V.
26. Deutscher Naturschutzring
27. Die Freien Bäcker e.V.
28. DOPPS-BirdLife Slovenia
29. ECOS (Environmental Coalition on Standards)
30. Environmental Investigation Agency
31. Essen mit Zukunft e.v.,
32. Eurogroup for Animals
33. European Environmental Bureau
34. Fenceline Watch
35. FIAN International
36. FIAN Sri Lanka
37. Foodrise
38. For a Better Bayou
39. Friends of the Earth Cyprus
40. Friends of the Earth Europe
41. Friends of the Earth Malta
42. Gallifrey Foundation
43. Générations Futures
44. Global Institute for Sustainable Prosperity
45. GRAIN
46. Green Light Foundation
47. Green Transition Denmark
48. Greenpeace
49. Heinrich-Böll-Stiftung e.V.
50. Humundi

51. IFOAM Organics Europe
52. INKOTA network
53. Institute for Agriculture and Trade Policy (IATP) Europe
54. Lanka Organic Agricultural Movement - LOAM
55. Linha Vermelha
56. Living Earth Coalition
57. Netzwerk Solidarische Landwirtschaft e.V.
58. Observatorio Universitario de Seguridad Alimentaria y Nutricional del Estado de Guanajuato
59. One Planet Port
60. Organization for Rural Self-Help Initiatives
61. Réseau Action Climat France
62. Slow Food
63. Slow Food Deutschland
64. The European Institute for Animal Law & Policy
65. The International Panel of Experts on Sustainable Food Systems (IPES-Food)
66. Voedsel Anders Vlaanderen
67. Women Engage for a Common Future, WECEF
68. World Future Council
69. Zelena Istra
70. ZERO - Associação Sistema Terrestre Sustentável
71. ZMAG
72. Zukunftsstiftung Landwirte

