

To: President of the European Commission, Ursula von der Leyen; Vice President of the European Commission, Teresa Ribera; Commissioner for Environment, Water Resilience and Circular Economy, Jessika Roswall, Commissioner for Agriculture and Food, Christophe Hansen; Commissioner for Health and Animal Welfare, Olivér Várhelyi

CC: Head of Land Use and Management Unit (ENV.D.1), Ion Codescu

26 June, 2026

Dear President, dear Vice President, dear Commissioners,

We are writing to you as representatives of farmers', civil and environmental organisations to express our strong concerns at the announcement, in the Fertiliser Action Plan, of an expansion of the RENURE act to include digestate. **We urge the Commission to refrain from further weakening of the manure limit in the Nitrates Directive as this is an essential environmental and human health safeguard.** Instead, the focus should be on closing implementation gaps and supporting farming systems and practices that build soil fertility and close nutrient cycles to reduce dependency on imports and farmers' vulnerability to input price volatility. This will ensure a resilient EU agricultural system and reinforce the Union's strategic autonomy, while protecting public health, water quality and biodiversity, and reduce the burden on public budgets.

Healthy freshwater ecosystems are the foundation of Europe's climate resilience, prosperity and competitiveness, as well as our key source of drinking water and the basis of agricultural production. But the current agricultural model, that has focused on high-input intensification and specialisation, has pushed Europe beyond the safe operating space for nutrients, leaving waters polluted, degraded and overused, undermining the services they can provide. More than [a third of groundwater bodies, rivers, lakes and coastal waters](#) are impacted by agricultural pollution, putting an unfair burden on society:

- **Nutrient pollution of water [cost EU taxpayers 22 billion euros yearly](#)**, including the cost of drinking water treatment;
- **Water pollution restricts access to drinking water.** More than [260,000 people in Spain lack drinkable tap water](#) due to unsafe levels of nitrates, resulting from fertilisers used in intensive agriculture and manure from industrial animal farming;
- **[Increased risk for colorectal cancer](#)** at nitrate concentration far below the current EU drinking water limit of 50 mg/L;
- **Contamination of micro- and nanoplastics from digested manure [disrupt soil nitrification and denitrification](#)**, resulting in both [nitrogen leaching and accumulation of plastics](#).

At the heart of this stands animal farming, which is responsible for more than [80% of nutrient pollution of water](#). Regretfully, the Water Framework Directive and the Nitrates Directive, that regulate water pollution from this sector, remain poorly implemented, and recent policy initiatives from the Commission have weakened existing safeguards. The RENURE act allowed a near 50% increase in the amount of nitrogen from manure that can be spread on fields, disregarding the efforts made by Member States to phase out their derogations to comply with the manure limit of 170 kg of nitrogen per hectare per year.

Transporting nutrient surpluses across Europe does not address the structural causes of nutrient imbalances, and loosening manure limits only makes it harder for Member States that have not yet brought farmed animal densities - and the resulting manure volumes - to sustainable levels, to achieve water quality objectives.

We are therefore utterly disappointed to see that the European Commission intends to extend the RENURE act, to also allow the application of digested manure above the limit set by the Nitrates Directive. This is particularly concerning as the European Ombudswoman has recently noted that [the preparation and adoption of the RENURE act included procedural failings](#) similar to those identified in earlier complaints where the Commission was found to have committed maladministration by departing from its own Better Regulation standards.

While we support the substitution of mineral fertilisers with organic fertilisers like manure where appropriate, this needs to be within an integrated nutrients management plan and balanced nutrient cycles that reconnect crops and animal farming, and part of a systemic shift to bring animal farming within ecological limits, without resulting in the lock-in of unsustainable intensive animal farming practices or further driving the consolidation of agriculture which has already resulted in thousands of farms disappearing each day. Investments in recovery facilities and biogas plants require an operational timespan of multiple years, creating a demand for manure which keep animal densities high in the surrounding area, runs counter to the Vision for Agriculture that highlighted the need to de-intensify animal farming regions.

Solutions that limit dependencies on external inputs already exist. Organic and agroecological farming practices that prioritise plant nutrition through the soil ecosystem and nutrient recycling - notably through territorial, crop-livestock integration in mixed farming systems, and long and diverse crop rotations with legumes -, have proven capable of reducing fertiliser use while strengthening resilience, biodiversity and farmer autonomy. Evidence, including from the Commission's own science and knowledge service, shows that a transition to such practices, together with a shift to more sustainable, plant-rich diets, is [the most efficient way to reduce nitrogen emissions](#). Supporting this transition would make the Zero Pollution objective to reduce nutrient losses by 50% by 2030 – to which there has been [no progress so far](#) – more attainable, while shielding farmers from volatile fertiliser prices, strengthening Europe's strategic autonomy, and ensuring food and drinking water production in the long term.

The declaration of the new Danish government, to act on agricultural pollution to protect water quality, biodiversity and human health, including by [lowering the nitrate limit in drinking water](#) from 50 mg/L to 6 mg/L following international expert advice, shows that change is possible where there is political will.

We believe that all Europeans deserve the same protections, for their health and their environment, we therefore urge the EU Commission to:

- Refrain from further weakening the manure limit in the Nitrates Directive, which represents an essential element of the directive and a key environmental safeguard;
- Refrain from opening the Nitrates Directive for revision, and instead focus resources on closing the data, implementation, enforcement, and funding gaps;
- Provide coherent recommendations on these issues, including the support for agroecology and organic, to Member States in the context of the development of the Common Agriculture Policy chapters within the National Regional Partnership Plans;
- Ensure that the upcoming Livestock Strategy can meaningfully contribute to the objective of the EU water acquis, by reducing excessive livestock concentration, supporting territorial mixed crop-livestock farming systems, rebalancing production across territories and strengthening farmer autonomy as envisaged in the Vision for Agriculture.

Yours sincerely,

BirdLife

Compassion in World Farming

European Environmental Bureau

Greenpeace

IFOAM Organics Europe

Safe Food Advocacy Europe

Wetlands International Europe

WWF European Policy Office

