

To: Environment and Agriculture Ministers of EU Member States

CC: Deputy Permanent Representatives of Member States to the EU

Re: The European Commission's plans to expand the RENURE act to include digestate

17 September 2026

Dear Ministers,

On behalf of the EEB network, I am writing to you to express our strong concerns about the European Commission's plans (included in the Fertiliser Action Plan and in the Livestock Strategy) to expand the RENURE Act to include digestate. This proposal would exempt digested livestock manure from the Nitrates Directive's manure application limit of 170 kg nitrogen per hectare per year in sensitive areas. At a time when Europe is facing unprecedented pressures on its water resources, weakening one of the EU's most long-standing environmental safeguards would be a serious mistake. **We therefore urge you to oppose any proposals that further weaken the manure application limit in the Nitrates Directive.**

The Nitrates Directive has played a crucial role in preventing and reducing agricultural pollution across the Union since its adoption 35 years ago, and the manure application limit is one of its cornerstones. **The Commission's recent evaluation of the Nitrates Directive confirmed that the Directive remains relevant and effective and specifically highlighted the importance of the manure application limit as a necessary and justified tool** to limit emissions, due to its function to control excessive concentrations of livestock.

We regret that recent policy initiatives from the Commission have already weakened this safeguard, without proper evaluation or assessment of the environmental or socio-economic impacts. The RENURE act, adopted in February this year, allowed a near 50% increase in the amount of nitrogen from manure that can be spread on fields. This legislative change was only based on a narrow study focusing on the agro-environmental behaviour of RENURE products, disregarding the role of the manure limit to regulate and limit the environmental effects of intensive livestock production. Introducing additional loopholes for digested manure would further erode a long-established environmental safeguard and runs counter to the Commission's own findings and previous commitments, such as the Vision for Agriculture that highlighted the need to de-intensify farmed animal densities in the regions that suffer from the most acute pollution.

The Commission's announcement is especially concerning as excessive nutrient surpluses from agriculture, primarily stemming from animal farming, continue to pollute water across Europe. While we're still waiting for the Commission's publication of the Implementation Report for the 2020-2023 period, the latest data available show that more than [a third of groundwater bodies, rivers, lakes and coastal waters](#) are impacted by agricultural pollution, putting an unfair burden on society.

The Commission's evaluation concludes that the 170 kg limit is not always strict enough to address eutrophication and in many cases results in an amount of phosphorus that exceeds crop needs. [The European Court of Auditors have found](#) that derogations from the manure application limits have provided an avenue for farmers to increase herd sizes and limited the achievement of the Nitrates Directive objectives. The European Commission's evaluation also points to how the higher farmed

animal densities and manure production allowed by derogations have contributed to negative effects on air, water, soil and protected habitats in the concerned Member States.

Loosening manure application limits will send the wrong signal to regions that have struggled for years with excessive livestock densities and chronic manure surpluses and will only make it harder to achieve the EU's water protection and Zero pollution objectives. Instead, it risks locking in unsustainable intensive animal farming practices and further driving the consolidation of agriculture, which has already resulted in thousands of farms disappearing each day. Poking holes in what has been the common minimum baseline risks distorting competition in the internal market, favouring only the few regions in the EU where farmed animal concentrations exceed the manure limit (see annex), and undermining the competitiveness of organic farming that has the 170 kg limit as a legal norm.

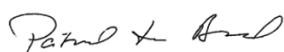
Substituting mineral and synthetic fertilisers with organic fertilisers like manure can and must be done without weakening long-standing environmental safeguards and be part of a systemic shift to bring animal farming within ecological limits. Evidence, including from the Commission's own science and knowledge service, shows that [the most efficient way to reduce nitrogen emissions](#) is a transition to organic and agroecological farming practices, together with a shift to more sustainable, plant-rich diets. Such farming practices, which prioritise nutrient recycling through territorial, crop-livestock integration in mixed farming systems, and long and diverse crop rotations with legumes, are proven to reduce fertiliser use while strengthening resilience, biodiversity and farmer autonomy.

The European Union has committed to cutting nutrient losses in half by 2030 – an objective to which there has been [no progress so far](#) – and restoring the health of its waters and ecosystems. Achieving these objectives requires stronger implementation of existing legislation, not new loopholes. The Commission's own evaluation demonstrates that the Nitrates Directive, including the manure application limit, provides the necessary framework to address agricultural pollution. The priority should therefore be to close implementation gaps and to support farmers to manage nutrients in a circular and sustainable way and to adopt practices that build soil fertility. This will help ensure food and drinking water production in the long-term, while reducing import dependencies and farmers' vulnerability to input price volatility.

For these reasons, we call on Environmental and Agriculture Ministers to:

- Call on the Commission to maintain the integrity of the Nitrates Directive's manure limit and reject any amendment to create a loophole for digested manure, or any other form of processed manure;
- Demand the publication of a thorough assessment of environmental and health impacts before any legislative change is proposed to ensure that all EU law-making is based on robust scientific evidence;
- Follow the Commission's country-specific recommendations to improve implementation of the Nitrates Directive and draw on them in the upcoming River Basin Management Plans.

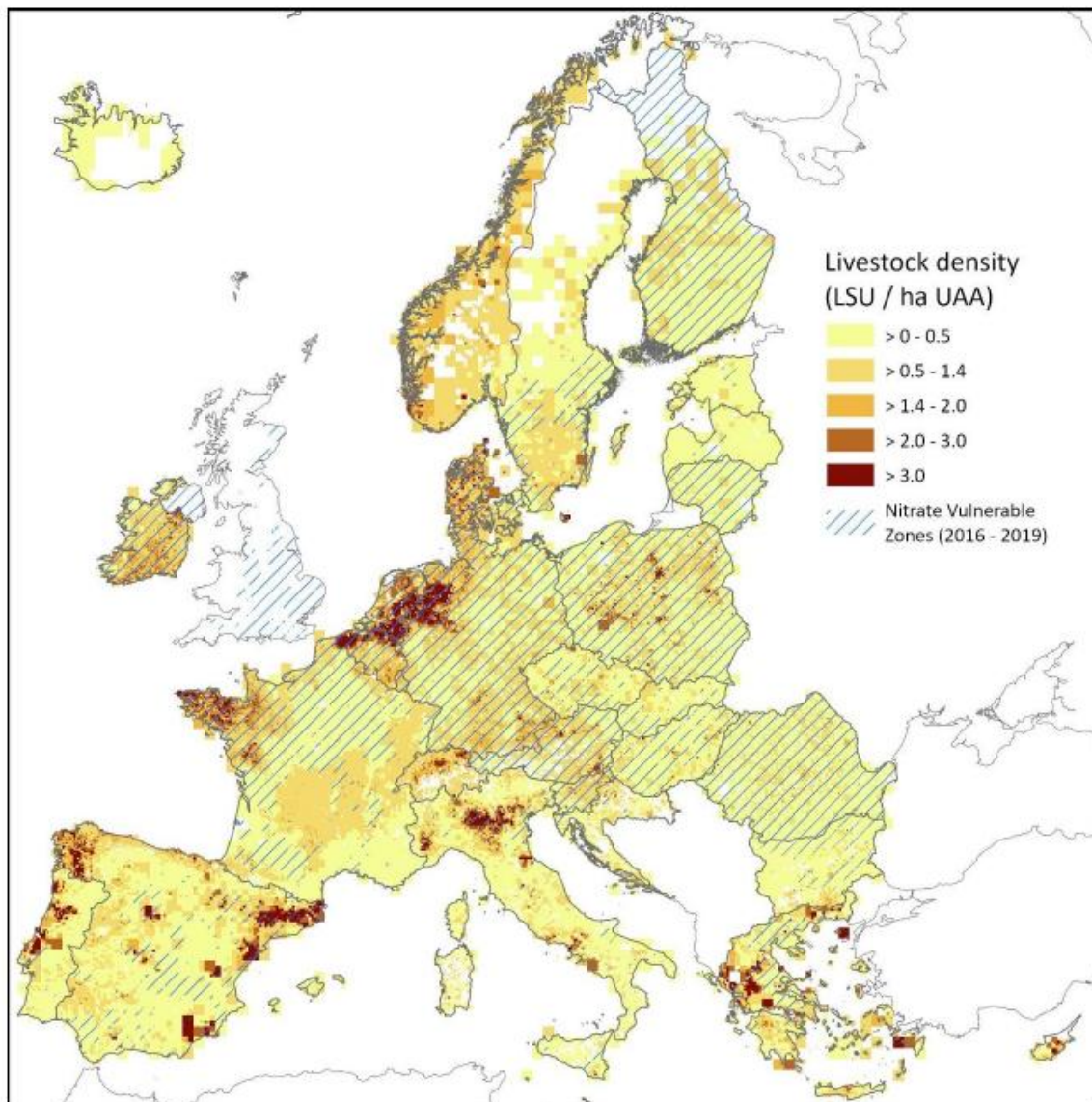
Yours sincerely,



Patrick ten Brink

Secretary General of the European Environmental Bureau

Annex



Source: JRC analysis, 2025.

Figure from the European Commission's Evaluation of the Nitrates Directive (Council Directive 91/676/EEC), part 9