

**To: European Commission Executive Vice-President for the European Green Deal Maroš Šefčovič**

**Cc: Commissioner for the Environment Virginijus Sinkevičius, Commissioner for Health & Food Safety Stella Kyriakides, Commissioner for Agriculture Janus Wojciechowski,**

**Minister for the Ecological Transition of Spain Teresa Ribera and Chair of the Committee on the Environment, Public Health and Food Safety Pascal Canfin**

**Re: Completing the European Green Deal: The Commission's initiative for an Integrated Nutrients Management Action Plan**

Brussels, 13 September 2023

Dear Executive Vice-President,

Following your recent appointment as the Executive Vice-President for the European Green Deal and your task to bring the European Green Deal forward, I am writing, on behalf of the undersigned, regarding the Commission's initiative for an **Integrated Nutrient Management Action Plan (INMAP)**, which should set the path for the EU to achieve its objective to **cut nutrient losses in half by 2030**. The INMAP was originally announced to be published in autumn 2022 but seems to face delays despite ample evidence that urgent action is needed to ensure that this key component of the European Green Deal is delivered swiftly.

The European Commission announced the INMAP in the Circular Economy Action Plan in March 2020, "with a view to ensuring more sustainable application of nutrients and stimulating the markets for recovered nutrients". In the **Biodiversity Strategy** and the **Farm to Fork Strategy (F2F)**, presented in May 2020, and the **Zero Pollution Action Plan** published in May 2021, the Commission committed to **reduce nutrient losses by at least 50% by 2030**, while ensuring no deterioration in soil fertility. The INMAP is [currently announced](#) to be presented in second quarter 2023 but has not been published yet.

The need for urgent action is obvious, the European Environmental Agency has estimated losses of nitrogen and phosphorus in Europe to exceed safe and sustainable levels by a factor of 3.3 and 2 respectively.<sup>1</sup> More than 30% of EU surface water, and more than 80% of EU marine waters are eutrophic, while 14% of groundwater exceed legal nitrate thresholds for drinking water.<sup>2</sup> The cost for water pollution due to nutrient pollution in the EU amounts to €22 billion annually.<sup>3</sup> It is also clear that integrated nitrogen management is needed to achieve the Net Zero target.

Modelling by the Commission's own science and knowledge service, the Joint Research Centre (JRC) has revealed that measures under existing legislation and policies, even if fully implemented, will only reduce the nutrient load to sea by 13% and 17% for N and P respectively.<sup>4</sup> This is far from the 50%

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<sup>1</sup> [EEA Report No 1/2020: Is Europe living within the limits of our planet — European Environment Agency](#)

<sup>2</sup> European Commission, (2021), [Report on the implementation of the Nitrates Directive for the period 2016-2019](#)

<sup>3</sup> European Commission, (2021), [Green taxation and other economic Instruments: Internalising environmental costs to make the polluter pay](#)

<sup>4</sup> Joint Research Centre, (2023), [Knowledge for Integrated Nutrient Management Action Plan \(INMAP\)](#) (JRC 2023)

reduction target and clearly shows that **policy measures beyond existing legislation are urgently needed in order to achieve the 2030 targets.**

The Biodiversity, F2F strategies and Zero Pollution Action Plan all foresee a cut in fertiliser use “by at least 20%”. However, science points to much greater reductions to be needed. The JRC, in its Knowledge for Integrated Nutrient Management Action Plan report, concludes that **the EU should reduce its annual mineral fertiliser input of N and P by about 60%** to reach sustainable nutrient flows.<sup>5</sup>

Such cuts can sound daunting, but empirical evidence points to the fact that fertiliser use can often be cut significantly without affecting yields<sup>6</sup> and modelling 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.**<sup>7</sup> Nutrient recovery from organic waste streams can contribute significantly to replacing synthetic fertilisers and the INMAP should address EU end-of-life criteria and markets for secondary raw materials. Such a transition of the food production system would also bring massive co-benefits by reducing the EU’s dependency on imports of fertiliser and feed in order to achieve strategic autonomy, slashing pollution by other agro-chemicals (pesticides and anti-microbials), and cutting water use by the sector.

To achieve this, bold action and clear directions are needed. We therefore urge the Commission to hold to its promise to deliver the INMAP and to listen to scientific expertise for setting the path until 2030 and beyond.

Several of our organisations contributed to the 2022 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.

In light of a summer that yet again was marked by extreme weather events made more intense by climate change, we once again reach out to you to ask you to deliver actions that safeguard our food, water and climate security in the long term.

Yours sincerely,



Patrick ten Brink

EEB Secretary General

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<sup>5</sup> JRC 2023

<sup>6</sup> Anthropocene magazine, (2019), [Here's how precision agriculture could help farmers reduce fertilizer use](#)

<sup>7</sup> 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>

## CSO/NGO signatories

Agroecology Europe

AirClim

AquaPublica Europea

BirdLife Europe

Corporate Europe Observatory

EurEau

Eurogroup for Animals

European Anglers Alliance

European Compost Network

Four Paws

Green Transition Denmark

IATP

IFOAM

Wetlands International Europe

## Academic signatories

Prof. Dr. Martin J Wassen & Dr. Jerry van Dijk, Utrecht University

Dr Kevin Hicks, Stockholm Environment Institute at York, University of York, UK

Prof. Josep Penuelas, CREAF-CSIC Barcelona





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