OPEN LETTER

Unlocking the safe use of RENURE products in the INMAP: an opportunity for nutrients recycling and on-farm circularity

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The cosignatories include COPA-COGECA, which represents over 23 million farmers and 22,000 agricultural cooperatives, the European Biogas Association, which represents nearly 8000 stakeholders from the biogas and biomethane value chain in Europe, as well as four European projects focusing on nutrients recycling and alternative fertilisers – Nutri2Cycle, NOVAFERT, FERTIMANURE and NUTRI-KNOW.

The need to **reduce dependency on nitrogen fertilisers by diversifying the sources of fertilisers and developing the supply of sustainable fertilisers** has gained urgency following Russia's war on Ukraine. **Using fossil-free, low-carbon, recycled nutrients to produce organic fertilisers** will also **accelerate the decarbonization pathway to a net-zero Europe**. These challenges were outlined in the communication of the Commission on Safeguarding food security and reinforcing the resilience of food systems from November 2022 as well as in the resolution of the European Parliament on the availability of fertilisers in the EU from February 2023. Yet, to date, RENURE ('Recovered Nitrogen from manure'; term and criteria as initially proposed by the European Commission) products face a major barrier in the 32 years old Nitrates directive and the market of these sustainable fertilisers struggles to develop due to a lack of legal certainty. Nonetheless, RENURE products have the potential to significantly replace synthetic/inorganic nitrogen fertilisers as produced based on natural gas, thereby improving both the environmental impact as well as economic and geopolitical self-reliance.

In the framework of the upcoming publication of the Integrated Nutrient Management Action Plan (INMAP), we call on the Commission **to allow and facilitate the safe use of RENURE products and employ the INMAP to provide guidelines for their usage in addition to the compositional criteria as previously proposed by the European Commission (yet never implemented upon their initial proposal).**

Organic fertilisers partially or entirely derived from animal manure through processing, known as RENURE, represent a key tool to **substitute synthetic/inorganic fertilisers, increase on-farm circularity and make food systems resilient as they depend on locally available resources while preserving the environment and waters in Europe**. In line with the objectives of the EU Green deal, RENURE products contribute to recycling nutrients, increasing resource efficiency and when adequately managed, avoid nutrients losses and maintain soil fertility.

In the framework of the INMAP, we urge the Commission to:

- allow for a **temporary exemption** from the Nitrates Directive limit, *in the short term*, so that **the safe use of RENURE products is allowed above the limit of 170 kg of nitrogen per hectare per year**, based on the **RENURE criteria developed by the Joint Research Centre**.

- propose **a revision of Annex III of the Nitrates Directives** to allow for a **permanent exemption** of RENURE products from the Nitrates Directive limit *in the medium term*. The Expert group on the implementation of the nitrates Directive or a dedicated expert group

should propose a **set of guiding agronomic practices to mitigate any potential environmental risks**.

Today, there are still a lot of misunderstandings regarding the application of **RENURE products**. Emphasizing the fact that 90% of organic manure can be applied immediately, or that there can be a risk of additional ammonia emissions is true but irrelevant. Multiple streams with different contents of nitrogen, phosphorus and other minerals such as potassium are created from the processing of classic animal manure. To this end, a **more targeted fertilization, tailored to crop and plant needs, is possible in a similar way to precision application of synthetic/inorganic fertilisers**. Moreover, the treatment process allows a **better recovery of ammonia in manure so that extra nitrogen fertiliser is ultimately available for the crops from the manure**.

RENURE is made by extracting the emitted ammonia and converting it into organic precision products. This process can happen in the barn or in a digester. Therefore, a reduction in ammonia emissions is already taking place. The manure is then further processed and remains integrally available to ensure fertilisation in the organic manure proportion. Thus, the conclusion is unmistakable:

- The basic fertilisation remains virtually the same although after treatment it concerns modified products which can be targeted more efficiently.
- The RENURE product obtained reduces ammonia emissions in the process, thus generating additional nutrients and having the same characteristics as fertilisers (able to replace synthetic/inorganic fertilisers and thus usable for precision farming).
- When applying RENURE products, there is a risk of increased emissions compared to synthetic/inorganic fertilisers application (as underlined in the Safemanure report by the Joint Research Centre). Nevertheless, there are available and currently applied techniques to avoid emissions and one cannot ignore the avoidance of emissions earlier in the process when producing such fertilisers.

Facilitating the use of RENURE products is therefore not about applying extra manure, but about replacing synthetic/ inorganic fertilisers in a sustainable, circular way, while at the same time avoiding ammonia emissions and also generating energy.

Thank you for your attention,

copa cogeca
european farmers european agri-cooperatives

EBA European Biogas Association

NUTRI•KNOW

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FERTIMANURE

Nutri2Cycle
Nurturing the Circular Economy