

ESPP input to EU INMAP (Integrated Nutrient Management Action Plan) consultation

26th April 2022

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12899-Nutrients-action-plan-for-better-management_en

ESPP (European Sustainable Phosphorus Platform) welcomes progress towards integrating EU nutrient policies, with the development of INMAP (Integrated Nutrient Management Action Plan). ESPP supports the Green Deal objective to reduce nutrient losses by 50% without deteriorating soil fertility, as fixed by the Farm-to-Fork and Biodiversity Strategies, in synergy with nutrient recycling.

ESPP notes that the consultation web page and the roadmap introduction refer to **food security** and **Circular Economy**, both of which are today urgent in the context of the **war in Europe**. The war's devastation will impact world food production and food security.

The conflict makes it urgent to **reduce import dependency on the EU-listed Critical Raw Material 'Phosphate Rock' and on natural gas for nitrogen fertiliser production**.

The emphasis of INMAP must not only be to reduce nutrient losses (N and P losses to water, ammonia air pollution and nitrogen oxides climate emissions, as in the proposal) but also nutrient recovery and recycling, and sustainable and healthy diets.

Dietary choices are a key driver of fertiliser use, of livestock production and of nutrient pollution, as well as of food security,

INMAP should not be limited to water policy, climate change and Critical Raw Materials policies, but should include:

- Social and economic support for sustainable diets, including ensuring that the EU does not “export” nutrient losses (e.g. via imported animal feeds)
- Targets for nutrient recycling and for avoidance of nutrient losses in food waste and food processing, defined at EU, MS and regional levels
- Integrating nutrient recycling into the revision of the Urban Waste Water Treatment and Sewage Sludge Directives, the Algae Initiative
- Addressing regulatory barriers to nutrient recycling from animal by-products, whilst guaranteeing safety
- Ensure that chemicals and pharmaceuticals policies reduce contaminants in nutrient flows and so enable safe recycling
- Fiscal and market tools to monetarise environmental and social impacts of nutrient consumption and support nutrient recycling, including e.g. nutrient recycling in the EU Taxonomy for green investment funding, extension of carbon credits to nitrogen greenhouse gases.
- R&I inc. nutrient flow data, demonstration projects
- Social awareness of nutrient use, recycling, losses
- Adapting the Common Agricultural Policy to monitor nutrient flows and to incentivise Nutrient Use Efficiency, optimised fertilisation, nutrient recycling and Nutrient BEMPs (Best Environmental Management Practices). Member State initiatives within the existing CAP will not be sufficient without such changes.

ESPP notes that the COM document indicates the overall environmental costs of nitrogen pollution at 70 – 320 billion €/year, but that in fact this covers only nitrogen. An estimate of costs of phosphorus losses is needed.

ESPP suggests that INMAP should include an **assessment of CAP to identify where policy changes may be needed to ensure achievement of the Green Deal nutrient loss reduction target** (including “exported” nutrient losses), covering both EU policy and MS implementation plans.

INMAP should **fix the objective to reduce and then end EU import dependency for the CRM 'Phosphate Rock' and for natural gas for nitrogen fertiliser production**, and should define and implement regulatory, fiscal and other policy actions to achieve this.

See also ESPP's detailed proposals for INMAP 27_3_2021 at <http://www.phosphorusplatform.eu/regulatory>