ESPP input to 2nd Renure consultation, 12th November 2026

"Nitrates – extending the rules on recovered nitrogen from manure"

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/19475-Nitrates-extending-the-rules-on-recovered-nitrogen-from-manure_en

ESPP considers that the 'Renure' process is failing to create a level playing field for recycled fertiliser products and is failing to address the nutrient problems of regional livestock concentrations.

Better use of manure nutrients will reduce dependency on imported phosphates and (for N fertilisers) of natural gas. However, ESPP considers that Renure should only be applicable to recycled products with clear and strict quality characteristics comparable to commercial mineral fertilisers. Both the 1st Renure amendment (2026/288) and this proposal allow materials with significant organic content or which are dilute, so do not have sufficient nutrient content or economic value to justify transport costs (will not incite to transport manure nutrients outside livestock hotspots). The definitions and specifications of Renure materials are not clear and may result in varying Member States interpretations, whereas the standardised criteria of the EU Fertilising Products Regulation could have been used (CMC12 for struvite, CMC15 for ammonia salts, PFC1(C)(I)(b) for mineral concentrates).

Also, the current Renure approach does not deliver a level playing field, because Renure products are subject to various constraints, so have to be specifically labelled, traced and traded separately from synthetic fertilisers, with complex administration, which will hinder roll-out of manure processing and nutrient recycling.

ESPP

- Suggests to replace Renure by an "End-of-Nitrates-Directive" status (without specific use conditions or traceability), applicable to recovered fertiliser products from manures which respect relevant EU Fertilising Product Regulation criteria: organic limits of "Mineral" fertilisers or of "Precipitated Phosphates", CMC and PFC criteria to ensure quality and safety. This would bring a level playing field, ensure clarity and regulatory coherence, incite nutrient recovery from manure to marketable products with improved nutrient use efficiency and which could be transported to regions needing nutrients.
- Regrets that digestate centrate would be authorised without minimum nutrient content. This will favour local spreading of dilute digestate and will not develop nutrient recycling.
- Suggests that limiting to "decanter centrifuge" fails to respect technology neutrality as per EU 'Better Regulation' principles. Why exclude other existing or future solid/liquid separation technologies which achieve the same or better results? Eligibility should be defined by product quality, not equipment.
- Regrets that the proposed text does not clearly allow co-digestion with animal by-products (despite recital 13). ESPP asks for clarification, coherent with FPR CMC5.
- Notes that the proposal seems to result in raw manure digestate centrate being covered, but not processed materials from this centrate (including not Renure I materials if recovered after digestion). The consolidated Nitrates Directive Annex III point 2(c) should be modified to clarify also from manure digestate or after manure processing. The words "out of livestock manure" should be deleted for 2(c)3 (struvite).
- Welcomes the obligation of phosphorus balances for all farms authorised to use 'Renure' materials above 170 kgN/ha/year.
- Welcomes the requirement (Annex point 2 – viii) that application of Renure digestates must always be with precautions to limit ammonia losses.
- Welcomes that the extension of drinking water protection from the vicinity of abstraction points to catchment areas.
- Notes that the draft (recital 4) refers to "biobased fertilisers" but there is no regulatory definition of this, nor "recycled nutrient" (see ESPP proposals for definitions).