



ESPP input to the EU public consultation on the proposed simplification of administrative burdens in environmental legislation – v2

7th May 2026.

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14794-Simplification-of-administrative-burdens-in-environmental-legislation-en>

ESPP (European Sustainable Phosphorus Platform) underlines the need to maintain and pursue the objectives of the EU Green Deal to achieve both environmental and economic sustainability objectives. Green Deal objectives for climate change, energy consumption and nutrient loss reduction are key to EU strategic resilience by making industry, agriculture and food production more efficient and less dependent on imported nutrients (EU Critical Raw Material Phosphate Rock, natural gas for nitrogen fertilisers).

ESPP supports administrative simplification where this does not reduce environmental standards.

ESPP accepts the **exclusion of Certified Organic livestock production from IED requirements** (Industrial Emissions and Livestock Rearing Directive), to avoid double regulation. Organic farms are already subject to environmental reporting in Organic Certification.

ESPP considers that the proposed exemption from reporting on water, energy and materials for livestock & aquaculture under IED to be a strategic error which would retard development of efficiency and recycling, leaving EU agriculture dependent on imports and exposed to price fluctuations:

- Materials include feeds, which rely on the EU CRM Phosphate Rock, in phosphate feed additives, in fertilisers used to grow feed crops and as organic phosphorus content of imported feeds. Removing feed reporting will retard efficiency improvement and nutrient recycling,
- Water is increasingly scarce in many regions of Europe with climate change,
- Energy costs are increasing with current international tensions.

IED reporting should be merged with the Farm Sustainability Data Network.



ESPP request that the Environmental Simplification package should simplify recycling of waste nutrient materials containing the EU CRM phosphate, including:

- 'Green List' (2024/1157 Waste Shipment Regulation) nutrient waste materials intended for incorporation into CE-Mark fertilisers and respecting CMC criteria or intended for processing into CMC (see ESPP input to green listing consultation 30/10/25 www.phosphorusplatform.eu/regulatory).
- address obstacles to recycling resulting from complexity, cost and delay for modification of IED site operating permits to allow intake of wastes substituting virgin materials;
- enable "default" Mutual Recognition of national fertilisers, subject to respect of EU safety criteria (FPR PFC criteria) and subject to cradle-to-grave digital traceability and producer responsibility;
- facilitate administration of wastes for R&D and testing of recycling processes and routes;
- simplify inclusion into the EU Fertilising Products Regulation of new materials and processes, responsive to innovation in Circular and BioBased Economy, with a criteria-based approach with industry-led data, rather than current one-by-one list amendments;
- develop general 'End-Status' for processes recognised as safe (End-of-Waste + Animal By-Product End-Point), based primarily on safety and quality of the recycled product, not on origin of input materials. However, traceability of the input material should be retained where pertinent;
- safety recognition under one regulation (e.g. food or feed) should translate to other regulations (e.g. fertiliser). Core dossier and data requirements should be harmonised;
- address barriers in REACH for recovered materials:
REACH art. 2(7)(d) should apply to recovered UVCB substances which are a variable combination of more than one already registered substance,
REACH SIP (Substance Identity Profile) should be available on request to enable demonstration of 'sameness' as required by art. 2(7)d.

See 50 organisations' Joint Call on Nutrients in the Circular Economy Act, Nov. 2025
www.phosphorusplatform.eu/regulatory.

ESPP, a non-profit, with 50+ company and research members, promotes implementation of sustainable phosphorus management and phosphorus recycling in Europe www.phosphorusplatform.eu