European Sustainable Phosphorus Platform

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# ESPP input to EU call for evidence on European Water Resilience Strategy

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*https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14491-European-Water-Resilience-Strategy_en*

ESPP (European Sustainable Phosphorus Platform) underlines the importance of Circular Economy (recycling of water and nutrients) in improving water resilience. Climate change is expected to increase the demand for both fertilisers and irrigation water to support crop production, due to enhanced nutrient mineralisation, higher crop uptake from increased atmospheric $CO_2$, directly linking water resilience to nutrient management and fertiliser use.

Adopting a Circular Economy approach not only improves water quality and reduces environmental damage (particularly eutrophication caused by nutrients, especially phosphorus) but also helps decrease Europe's reliance on imported fertilisers. The EU is currently highly dependent on phosphorus fertiliser imports, with Russia accounting for approximately 30% of these imports (Fertilizers Europe). This dependency undermines EU strategic autonomy and food security, especially since EU policies have inadvertently increased fertiliser imports from Russia since 2021, indirectly funding Russia's war. Moreover, the EU's decision to halt gas imports from Russia has disrupted nitrogen fertiliser production within Europe, further emphasizing the need for a shift toward sustainable and circular nutrient management.

The EU Water Resilience Strategy should take into account:

- The Critical Raw Materials Act, which classifies Phosphate Rock as a Critical Raw Material, underscoring the urgency of adopting more sustainable and circular approach to face supply risks.
- The European Commission's announced EU Circular Economy Act, to follow the second Circular Economy Action Plan (March 2020), which will include measures to create market demand for secondary materials and establish a unified waste market, with a focus on Critical Raw Materials.
- The recast Urban Waste Water Treatment Directive 2024/3019 which refers to water resilience in Recital 29 and art. 15 and requires the definition of Phosphorus Reuse and Recycling Rates in art. 20.

In this context, effective water management and the ability of the water sector to embrace a circular economy approach through practices such as fertigation and water reuse closely linked to achieving the EU objectives on nutrient circularity. These practices are supported by the recast Urban Waste Water Treatment Directive (UWWTD 2024/3019) and the Water Reuse Directive 2020/741, which aim to optimise the use of water and nutrients, reducing the pressure on freshwater resources and improving agricultural sustainability.

Prevention of pollution at source is a key prerequisite for water reuse, for nutrient recycling and for circularity of other materials recovered from waste water treatment. Industrial chemicals which pose obstacles to circularity or to water reuse should be phased out rapidly, with authorisation only for very limited authorisations for limited essential uses where loss to the environment is not expected until alternatives can be developed. In particular, the restriction of PFAS announced in 2020 (COM(2020)667) should be implemented rapidly, banning all non-essential uses.

In conclusion, as climate change drives the increased need for fertilisers and greater irrigation requirements, the need for a Circular Economy approach becomes even more critical. This approach links water resilience to nutrient management and fertiliser use, ensuring sustainable agricultural production and water conservation in the face of climate change.