

# ESPP proposals

## on market “pull” policies for uptake of recycled nutrients

- **Policies should incentivise nutrient recovery only where the recovered nutrient product is of quality and corresponds to user needs and specifications.**
- Integrate into the **next CAP revision** (revision starting probably 2025)
  - support for fertiliser use optimisation, use of recycled nutrients and organic fertilisers in CAP Strategic Plans,
  - add a GAEC for the use of recycled nutrients,
  - propose that national CAP FaST tools should monitor the use of recycled nutrients,
  - include advice on use of recycled nutrients in the CAP Farm Advisory Services requirements,
  - support farmer investments in nutrient recycling and in digestate processing.
- **Condition farm carbon credits** (for spreading of organic materials) to nutrient balance and to application of nutrients according to crop needs and in a form available to crops.
- Propose inclusion of nutrients into future **agriculture ETS** (Emissions Trading System).
- Extend the existing **CBAM** (Carbon Border Adjustment Mechanism) on fertilisers to cover phosphorus, including with a P-BAM on both P in imported fertilisers, animal feed and food products, and with a parallel mechanism to also ensure a level playing field for exports by EU fertiliser producers and farmers.
- **Clarify definitions of “recycled” and “bio-based” for nutrients.** Request development of standards for these by CEN and inclusion into the FPR (EU Fertilising Products Regulation), under labelling criteria (Annex III). See ESPP proposals for defining “bio-based nutrients” [here](#) (under ‘Standards’).
- Call for an EU **study of possible impacts of a progressive quota on recycled nutrients**, covering all EU fertiliser sales (including of organic fertilisers), and of an accompanying recycled nutrient credit trading scheme. This study should assess possible benefits for nutrient recycling and possible negative impacts.
- Exempt certain recycled-N products derived from manure under the **EU Nitrates Directive** (exempt these from N spreading limits for processed manure) subject to: must not facilitate livestock production concentration, must be readily verifiable by authorities, must not allow untreated or scarcely processed manures.  
*NOTE: see the [Commission proposal of May 2024](#).*
- Work with the Certified **Organic Farming** movement (IFOAM Europe) to admit further recycled nutrient products as inputs to Organic Farming.
- Extend the current EU **‘Taxonomy’ for sustainable activities** (\*) to cover:
  - P-recovery from other secondary nutrient streams
  - N-recovery
  - processing of digestate and use as fertiliser*\* Taxonomy P-recovery and anaerobic digestate sections, next cutoff end 2024.*
- Include the above in **Green Public Purchasing**.
- Engage a European Commission study into possible extension, beyond the revised Urban Waste Water Treatment Directive (UWWTD), of **phosphorus reuse and recycling targets to other secondary nutrient streams**: organic fraction of municipal solid waste, food processing, abattoirs, intensive livestock manure ...
- Include in revision of the **EU Sewage Sludge Directive**: tighter contaminant limits, obligatory quality assurance schemes and best sludge management practices including for nutrient valorisation
- **Evaluate the potential for nitrogen recovery** in wastewater treatment, sewage sludge handling, from sewage sludge and other combustion / incineration processes (from NO<sub>x</sub> offgas stripping).
- Launch a European Commission policy analysis **to develop an INMAP (Integrated Nutrient Management Action Plan)** and to enact the Farm-to-Fork and UN COP 15 Biodiversity Strategy nutrient loss reduction targets.
- Continue actions to **address regulatory obstacles to nutrient recycling**, including:
  - admit further recycled nutrient materials into the EU Fertilising Products Regulation (FPR, CMCs), simplify and accelerate the process for such modifications to the FPR, in particular for low-volume secondary materials
  - simplify and reduce costs of FPR certification,
  - authorise use of Category 1 Animal By-Product ([Cat.1 ABP](#)) ash in EU fertilising products (subject to EFSA opinion on safety),
  - facilitate and accelerate modification of site operating permits to allow fertiliser production sites and other industries to take in waste as input for nutrient recycling,
  - address obstacles to recycling of nutrients in animal feed regulations, whilst ensuring food-chain safety,
  - address End-of-Waste questions and incoherencies between different Member States.
- Develop a public, **online communications tool** to promote nutrient stewardship and recycling (with sign-up-to-support).

### Acronyms

ABP = [Animal By-Product](#). CAP = [Common Agricultural Policy](#). CBAM = [Carbon Border Adjustment Mechanism](#). CEN = [European Committee for Standardisation](#). CMC = Component Material Category, as defined in Annex II of the EU Fertilising Products Regulation. COP 15 = [UN Biodiversity Conference 2022](#). EFSA = [European Food Safety Agency](#). ESPP = [European Sustainable Phosphorus Platform](#). ETS = [Emissions Trading Scheme](#). FaST = [Farm Sustainability Tool for Nutrients](#). FPR = EU Fertilising Products Regulation [2019/2009](#). GAEC = Good Agricultural and Environmental Conditions (a tool of CAP [conditionality](#)). IFOAM [Organics Europe](#) = International Federation of Organic Agriculture Movements. UWWTD = Urban Waste Water Treatment Directive [1991/271](#), revision pending publication (as at December 2024). INMAP = [announced](#) European Commission initiative ‘Integrated Nutrient Management Action Plan’.

