

## **ESPP** input:

## EU public consultation on the proposal for evaluation of impacts of EU farm policy on water.

Proposed Evaluation Roadmap "Evaluation of the impact of the CAP on water"

<a href="https://ec.europa.eu/info/law/better-regulation/initiative/1951/publication/320178/attachment/090166e5beca8f7a">https://ec.europa.eu/info/law/better-regulation/initiative/1951/publication/320178/attachment/090166e5beca8f7a</a> en

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NOTE: the consultation concerns the proposed outline and objectives of the evaluation. The consultation does not address farm policy itself.

## **ESPP INPUT TEXT**

Agriculture has major impacts on water, including input of nutrients (phosphorus, nitrogen) to surface and ground waters. Phosphorus-related eutrophication is one of the main causes for surface water failures to achieve Water Quality Framework quality status objectives. These nutrient losses are not only a major problem for water, but also represent a loss of value for farmers (costs of mineral fertilisers or organic amendment application) and often reflect soil loss.

The Commission's proposal for the CAP after 2020 include the "Farm Sustainability Tool for Nutrients" (presented now as 'FaST'). This is a potentially important tool to improve nutrient management, to facilitate access to information for farmers, as well as improving reporting. The proposed evaluation should identify existing similar tools and systems (e.g. balanced fertilisation requirements), assess their effectiveness in reducing impacts on water, and derive possible recommendations for the future FaST tool.

The overall objective of the evaluation should be to consider whether the different mechanisms of the current CAP (and those proposed for the 2020 CAP) are compatible with achievement of the Water Framework Directive quality objectives, and if not to make proposals to improve the compatibility. This should also take into account other sustainability objectives, such as Critical Raw Materials, Circular Economy, greenhouse emissions and National Emissions Ceilings Directive, soil conservation ...

The proposed Roadmap states that this evaluation will contribute Data collection and methodology: The proposed evaluation should consider the Commission "Nitrates Directive implementation reports" and other relevant documentation.

Consultation of citizens and stakeholders: Stakeholders consulted should include water basin management organisations, both at the national/regional and at the local levels. Furthermore, proactive communications effort should be made to encourage local water basin management committee members to respond to the internet consultation.



Coherence: in order to ensure coherence of evaluation, not only the CAP itself should be evaluated, but also other related policies, for example the specific "agriculture" R&D funding under Horizon 2020 and the Rural Development "Operational Groups".

The European Sustainable Phosphorus Platform (ESPP) promotes the implementation of sustainable phosphorus management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation, funded by its members. The Platform has over 40 members from a range of different industries (water and waste companies, mineral and organic fertilisers, chemicals, recycling technologies), knowledge institutes and public establishments. <a href="www.phosphorusplatform.eu">www.phosphorusplatform.eu</a> Email info@phosphorusplatform.eu