

## NUTRIBUDGET Position Paper to Nitrates Directive Consultation

Ludwig Hermann, Proman Management GmbH., Transparency Register # 819334232897-22819334232897-22  
NUTRIBUDGET project partner in charge, among others, of Policy Recommendations and Policy Briefs

The objective of NUTRIBUDGET is to develop and implement **Nutriplatform, an integrated tool for nutrient management**. Its **function is “decision-support” for farmers**, advisors, European policy makers and regional authorities. Nutriplatform is based on knowledge from **tested agronomic mitigation measures** linked to advanced Nutrimodels that integrate nutrient models, data standards and monitoring indicators. Thereby, NUTRIBUDGET contributes to **optimize nutrient flows and budgets** across different agricultural production systems to reduce pollution from excessive use and losses of nutrients.

The Nitrates Directive aims to reduce water pollution from nitrates used for agricultural purposes and prevent any further pollution. It requires Member States to establish **mandatory action programmes** for designated affected areas (vulnerable zones) and monitor the **effectiveness** of the action programmes to improve water quality. Member States must also carry out **monitoring programmes**, draw up a **code of good agricultural practices**, which farmers apply on a voluntary basis and provide **training and information for farmers**.

It is evident that solutions developed in NUTRIBUDGET can provide what the Nitrates Directive requires. The toolbox includes data-based measures (sensors, drone and satellite data), analytical tools (MFA/SFA), nature based and biobased solutions (fermentation, anaerobic digestion, floating plants, biobased fertilisers, carbon sequestration, constructed wetlands) and to some degree chemical additives – all aiming at nutrient loss mitigation.

### NUTRIBUDGET’s position regarding the Nitrates Directive Consultation is

#### I) Principles

1. The objectives of the Nitrates Directive should be reinforced, albeit with details adapted to the Green Deal, the Farm-to-Fork strategy and the recast water related regulations and directives.
2. Voluntary environmental services such as the ones tested by NUTRIBUDGET, must be compensated in a fair manner if they require additional work or costs without increasing the farm revenues. Best practices are tariffs for subsidies for voluntary mitigation measures. If a farmer subscribes to the programme, he must make a selection of measures from a catalogue where the measures and corresponding payments are listed.
3. Biobased mineral products as defined in the Fertilising Product Regulation (EU) 2019/1009 (characterized by  $<1\% C_{org}$  content) must be exempt from the use restrictions stipulated by the Nitrates Directive for manure. If products are the same as conventionally produced fertilisers, they must be regulated like conventionally produced fertilisers and not as manure.

#### II) To be considered

4. As far as possible, recommended measures such as the ones tested in NUTRIBUDGET should be harmonized and enforced throughout the EU. Only the amount of compensation (subsidy) could be adapted to the income level of the member state.
5. To enhance the use of biobased fertilisers, a blending quota, e.g. 10% biobased fertilisers added, may be considered.
6. In addition to mitigation of emissions to water, mitigation of N-emissions to air ( $N_2O$ , ammonia) should be considered.

Overall, the recast Nitrates Directive may require more harmonized and stricter compliance by farmers while all costs incurred to the farmer for environmental services must be financially compensated.

8<sup>th</sup> March 2024/Ludwig Hermann