



IGB

Leibniz Institute of Freshwater Ecology
and Inland Fisheries

EU CONSULTATION

**Nitrates – updated rules on the
use of certain fertilising
materials from livestock
manure (Renure)**

IGB Feedback

Introduction, background and focus

The Leibniz Institute of Freshwater Ecology and Inland Fisheries (IGB) is Germany's largest research centre for freshwaters. Our research findings help to tackle environmental changes and to develop strategies for sustainable water management – true to our guiding principle “Research for the future of our freshwaters”. Based on our research and expertise, we comment on the EU Consultation on the planned update of the rules on the use of certain fertilising materials from livestock manure (Renure).

In their [recent feedback on the Nitrate Directive](#), the IGB researchers already underlined that a revision of these rules should *not* lead to a further weakening of the limits and rules, but should strengthen them. **The current limit of 170 kg nitrogen per hectare should be handled as a maximum level**, which is, from an environmental research perspective only acceptable, if applied in areas with sufficient denitrification potential in soils and groundwater.

Otherwise, nitrogen applications at this level potentially pose a major threat to aquatic ecosystems, their biodiversity, their functions and thus, also their ecosystem services. The latter are an indispensable basis for our own lives, such as the provision of clean drinking water and self-purification, stable landscape water balance, natural flood protection, cooling effect, fishery resources or recreational spaces. **High nitrogen loads in freshwater ecosystems become particularly dangerous in the context of rapidly progressing climate change, while in parallel weakening their resilience and crucial role in climate change adaptation and mitigation.**

High nitrate emissions are further one of the main reasons why European water bodies still fail to meet binding environmental targets for European biodiversity and water protection, such as those set out in the Flora-Fauna-Habitat Directive, the Water Framework Directive and the Marine Strategy Framework Directive.

The policy objective of closing nutrient cycles serves justified objectives of agriculture and nature conservation. An increase in the total amount of applied nitrogen would counteract these objectives. **The precautionary principle is crucial**: every nutrient excess from fertilizers – whether from mineral or organic sources – will sooner or later also lead to the pollution of groundwater and surface waters. It is illusory to believe that any product fertilises only the desired crop plants and not the environment. If these compounds were permanently stable, the nutrients would not be available for terrestrial crops either.

Therefore, the current limit of 170 kg nitrogen per hectare and year should not be exceeded, and Renure fertilisers should not profit from any exceptions from these limits. At the same time, if Renure fertilisers prove to have similar properties to mineral fertilisers, they could replace these to some extent, what can be welcomed from a sustainability perspective. Nevertheless, **the composition and effects of Renure fertilisers would need to be further investigated**, as also phosphorus loads and potential pharmaceutical residues have to be taken into account.

It is well known that several European regions are hotspots of livestock farming, leading to nutrient surpluses far too high. **The adaptation of the Annex regulations should *not* be used as a political instrument to allow even more nutrients to be released into the environment in these regions.** Instead, efforts should be made to mitigate these nutrient hotspots, and to foster more sustainable agricultural practices.

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