

Brussels, 8 March 2024

Agroecology Europe, the European Association promoting agroecology as a set of practices, a science, and a movement across Europe, welcomes the opportunity to provide evidence to the evaluation of the Nitrates Directive. Agroecology Europe is committed to promoting sustainable agricultural practices that prioritise environmental and human health, biodiversity, and the well-being of farmers and consumers.

The current state of EU agriculture is concerning, particularly regarding the substantial annual loss of reactive nitrogen, estimated at 6.5-8 million tonnes, due primarily to livestock production¹. These losses contribute to environmental and health damages, necessitating a critical evaluation of the effectiveness of the EU Nitrates Directive (91/676/EEC).

While the Directive was established in 1991 to address water pollution caused by nitrates from agricultural sources, recent European Environment Agency analysis indicates unsatisfactory progress in its implementation. From 2000 to 2021, there has been no significant change in the average nitrate concentration in EU groundwaters, and the number of monitoring stations registering nitrate concentrations exceeding 50 mg/l has not decreased².

Moreover, derogations granted to livestock-intense countries, such as the Netherlands³, Ireland⁴, and Denmark⁵, have further undermined the Directive's impact. The lacking implementation of the Nitrates Directive lies not only in these extensive derogations but also in the insufficient consideration of systemic approaches considering farms, landscapes, and territorial development. AEEU emphasises the need to consider an agroecological approach that closes nutrient cycles—both nitrogen and phosphorus—and adapts production systems to territorial capacities and local food needs.

European agriculture must move towards production systems based on biological rather than chemical production factors: legume-based nitrogen versus fossil-fuel based nitrogen, biological control versus pesticides, and cropping practices that preserve soil organic matter and foster biological activity. These biology-based

¹ Sutton, M.A., Howard, C.M., Erisman, J.W., Billen, G., Bleeker, A., Grennfelt, P., van Grinsven, H., Grizzetti, B., (eds.) (2011) The European Nitrogen Assessment: Sources, Effects and Policy Perspectives. Cambridge University Press, Cambridge, pp. 612. [Link here](#)

² EEA, 2023, 'Nitrate in Groundwater' . [Link here](#)

³ Decision (EU) 2022/2069. [Link here](#)

⁴ Decision (EU) 2022/696. [Link here](#)

⁵ Decision (EU) 2020/1074. [Link here](#)

practices lead to longer rotations, more widespread use of intercropping, and a more diversified range of crops, creating agroecological systems.

Key measures promoting agroecology should be adopted and reinforced to address nitrogen pollution:

- Mandate cover cropping during winter periods to limit diffuse nitrate transfers to water bodies. At the moment, the conditionality requirements relevant to soils (GAEC 4, 5, 6, and 7) are implemented too weakly by Member States to reduce soil degradation.
- Implement regulations on specific agricultural practices, such as vegetation cover during intercrops, precautions along watercourses, and precise fertilisation adjustments (GAEC 1).
- Preserve semi-natural habitats that play a crucial role in biodiversity conservation, water quality, and carbon storage (GAEC 8).

We emphasise the importance of promoting agroecology⁶ as the key in enhancing the implementation of both the Nitrates Directive and the Water Framework Directive, avoiding derogations from the former, and **implementing an Integrated Nutrient Management Action Plan to achieve a 50% reduction in nutrient losses by 2030 as outlined in the EU Green Deal.**

In response to the recent proposition made by the Netherlands⁷ at the Council to amend the Nitrate Directive, AEEU urges caution. The proposed utilisation of RENURE products beyond the established 170 kg threshold allows the continuation of an inefficient, polluting, and unsustainable food production system. Rather than seeking alternatives to synthetic fertilisers and the huge concentration of manure, the focus should be on adjusting herd sizes to the capacity of the territories.

The emissions of nitrates are closely tied to the density of animals raised, and an agroecological approach that emphasises nutrient circularity and symbiosis can offer sustainable solutions. **AEEU discourages additional exemptions from the Nitrates Directive and warns against false solutions like RENURE.**

In conclusion, the Nitrates Directive is a crucial tool for reducing nitrate pollution, but its implementation requires significant improvement. AEEU urges an active implementation, restriction of derogations, and integration of water protection goals into the Common Agricultural Policy (CAP).

Promoting agroecological practices and fostering sustainable dietary shifts through policy initiatives like the Sustainable Food Systems Framework is imperative for achieving comprehensive environmental and health improvements. Implementing a food system redesign approach that includes incentives for dietary changes is crucial in this endeavour. There is an urgent need to rebalance protein intakes by increasing the share of legumes in European diets and favouring extensive grass-fed and pasture-based livestock systems. Addressing inputs and outputs in a holistic manner is essential to achieve the indicative target of halving nutrient losses. By embracing a comprehensive approach to nutrient flows,

⁶ European Commission, 2022, “Ensuring the availability and affordability of fertilisers”. [Link here](#)

⁷ <https://data.consilium.europa.eu/doc/document/ST-5502-2024-INIT/en/pdf>

we can work towards sustainable agriculture and healthier diets, contributing to the overall well-being of both the environment and the population and fulfilling the EU Green Deal objectives.

Agroecology Europe is at the disposal of the Commission for any request it may have and would be pleased to offer its expertise on sustainable Nitrates management.

For any further information please contact our Secretariat:

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