Concept reactie op de EU Consultatie Renure-richtlijn opgesteld door NCOK versie 22 april 2024

1 The Foundation "Dutch Center for the Development of Circular Precision Fertilization " (NCOK) welcomes the proposed *COMMISSION DIRECTIVE (EU)amending Council Directive 91/676/EEC as regards the use of certain fertilising materials from livestock manure*  as a major step on the road towards zero-emission agriculture through utilization of technological developments and good agri-environmental practices as mentioned in  "whereas"  under point 6 and 16. NCOK, founded in 2015 by three Dutch private middle sized companies active in the collection and distribution of circular fertilizers and in the production of applicators for these fertilizers, communicates on 4R Nutrient Stewardship with circular fertilizers and precision, see smartfertilization.org (in Dutch)

.

2 NCOK advocates steering on goals instead of steering with instruments, such as maximum rates of application for different types of fertilizers, as is the case under the current regime of the Council Directive 91/676/EEC. NCOK expects that the announced revision of this Council Directive 91/676/EEC will soon bring to an end the regulation on maximum application rates such as the 100 kg N/ ha limit for Renure fertilizers, as this severly impedes precision fertilization. The development of precision fertilization calls for steering on zero- emission, the sooner the better. NCOK, urges for this for a lang time and consequently also in the context of this consultation .

3 The actual large supply of Renure fertilisers as a substitute for ammonium nitrate containing fertilisers in the sense of the  *EU* Regulation *2019/1148* , will highly contribute to the safety of the inhabitants of the EU and cannot remain unmentioned as a strategic consideration in this amendment.

Therefore  NCOK proposes to include the words "*and safety"* in  the first sentence of the proposed *COMMISSION DIRECTIVE* under "whereas" point 4 as follows" : “Broader application of organic fertilisers and nutrients from recycled waste streams could strengthen the Union’s open strategic autonomy, food security  *and safety* while setting out high sustainability standards, in particular in regions with a low uptake of organic fertilisers ".

4 NCOK considers full utilization of all possible technical developments as prerequisite for zero-emission agriculture and therefor regrets that in the proposed *ANNEX to the Commission Directive amending Council Directive 91/676/EEC as regards the use of certain fertilising materials from livestock manure as regards the use of certain fertilising materials from livestock manure* only three Renure fertilisers are being defined, whereas other nitrogen fertilisers recovered from manure with the same properties as these three are already or will soon become available, such as urine or fertilisers recovered with membrane electrodialysis technology.

Therefore NCOK proposes  in the abovementioned *ANNEX* under  (c)( i) (2) to substitute the words "reverse osmosis" by  "s*eparation techniques"*