



**Finnish Biocycle and Biogas Association (SBB) welcomes the evaluation of the EU's Nitrates Directive, so that the latest information can be assessed whether the Nitrates Directive sufficiently supports the agricultural use of recycled organic fertilizers and promotes the recycling of nutrients and carbon.**

SBB supports focusing on nutrient balance as well as recognizing the role of organic carbon in soil. Healthy soils tolerate the factors that stress it; It buffers and balances the water quality of groundwater. Organic carbon is an essential part of healthy soil. More attention should be paid to the sustainable use of recycled organic fertilizers and soil improvers (such as compost and digestate), as they can increase the amount of organic matter in the soil, which in turn acts as a buffer for nutrient leaching. **Sustainable agriculture is based on healthy soil and nutrient recycling: It is the basis for the EU's Circular Economy Strategy and the Farm to Fork Strategy set out in the European Green Deal.**

In the evaluation of the Nitrates Directive, it is important to identify the high stable organic carbon content, high organic nitrogen content and lower plant-available nitrogen content relative to total nitrogen in certain organic recycled fertilizers. - Organic recycled fertilizers can distribute the plant-available nitrogen over a longer growing season because of the organic nitrogen. In favourable growing season conditions and with the right fertilization, this can reduce the risk of nitrogen leaching.

The nutrients from recycled organic fertilizers and soil improvers should be taken into account when calculating the nutrient balance. The aim should be appropriate nitrogen fertilization and minimizing nitrogen losses rather than minimizing nitrogen use.

The evaluation of the Nitrates Directive should pay attention to EU's security of supply, and recognize the role of recycled organic fertilizers and soil improvers in this discussion. The directive should encourage the use of recycled fertilizer products (processed from organic masses) similar to mineral fertilizers, in which case dependence on mineral fertilizers can be reduced. Longer refined recycled fertilizer products, which behave similarly to mineral fertilizers in fields, do not have the risk of releasing organic nitrogen in unfavorable growing conditions and at the wrong time for the plant needs. **Such recycled fertilizers with a higher degree of processing should be able to be used for fertilization needs that exceed the total amount of nitrogen in the manure, similarly to mineral fertilizers.** This possibility would also encourage the production of further processed recycled nutrient products and thus expand their use as a substitute for mineral fertilizers.

**It is important that the directive enables the sustainable and adaptable production of recycled fertilizers and practicing agriculture and does not weaken food security.**

SBB sees it as appropriate to find out the effectiveness of the nitrates directive in meeting the EU's environmental and climate goals: Does it effectively promote sustainable food production in a changing



climate and environment and does it take into account new advanced technology? Utilization of new technology, farming techniques and plant varieties can improve nitrogen utilization by plants.

In this regard, in the evaluation of the Nitrates directive, it would be necessary to evaluate the appropriateness of covering/covering the sludge tanks on farms when it is a fertilizer product recovered from a biogas plant. Farms must cover their sludge tanks if they receive a fertilizer product from the biogas plant. This brings significant additional costs to farms and can, at worst, prevent participation in the operation of the biogas plant or at least reduce the overall benefit from the biogas plant's fertilizer product and thus the realization of the circular economy. Covering brings significant additional costs to farms and obstacles to participating in the activity, in which case the small possible  $\text{NH}_3$  emissions are not in proportion to the potential climate benefit that can be achieved on the one hand, when manure or other agri-biomasses inputs are delivered to the biogas plant for processing. Secondly, the impact of small ammonia emissions on climate change is still unclear, as studies conducted in recent years even indicate that ammonia could have a positive effect on the formation of climate-cooling aerosols, i.e. they could slow down climate change.

Contact person:

Nelli Pitkänen, Nutrient Recycling Specialist, Finnish Biocycle and Biogas Association, Eteläranta 10, 00131 Helsinki, 0400 976 053 | [nelli.pitkanen@biokierto.fi](mailto:nelli.pitkanen@biokierto.fi)