



Position Paper:  
**Fertiliser  
Action  
Plan**

27 February 2026



**Plant/Animal health  
& Welfare**

**copa**\***cogeca**

european farmers

european agri-cooperatives



## Introduction

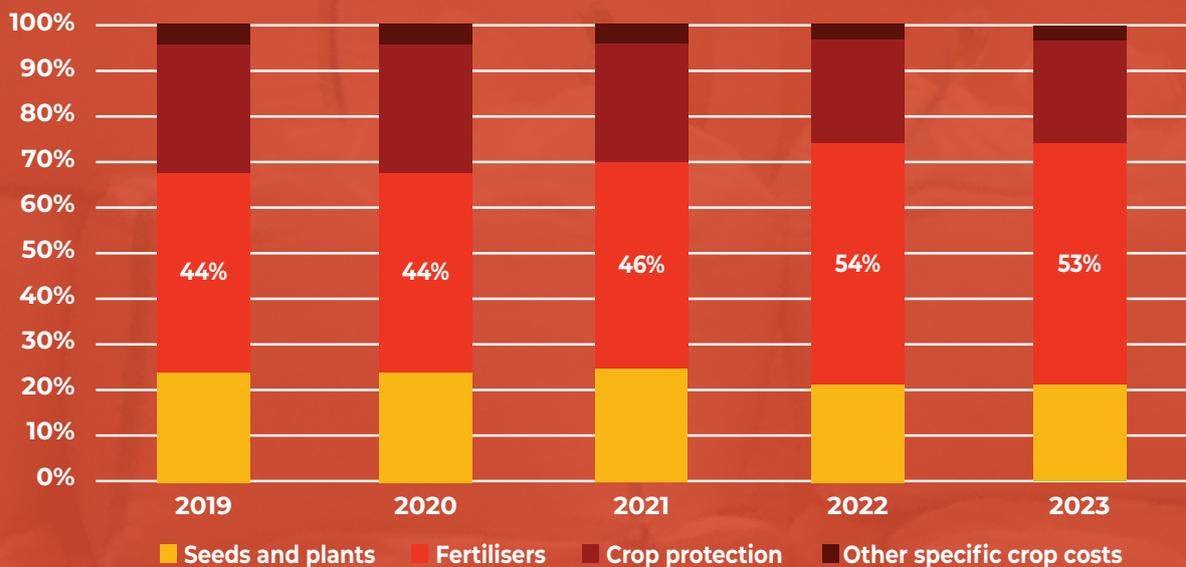
Following remarks by EU Commissioners after the Agriculture Ministers' meeting held on 7 January 2026 in Brussels, the European Commission announced its intention to present a **Fertiliser Action Plan** in the second quarter of 2026. The initiative aims to address persistent structural challenges affecting fertiliser markets, such as security of supply, sustainability, and price volatility, and aims to promote the increased availability and use of recycled nutrients and alternatives from organic sources, including through modifications of the regulatory framework.

This announcement comes amid persistently high input costs for farmers, significant market distortions, and the European Union's continued dependence on imported fertilisers, while

available organic sources remain underutilised due to regulatory constraints. Fertiliser affordability and availability and nutrient circularity, and reduced import dependency, are essential for farm profitability, food production, and EU food security.

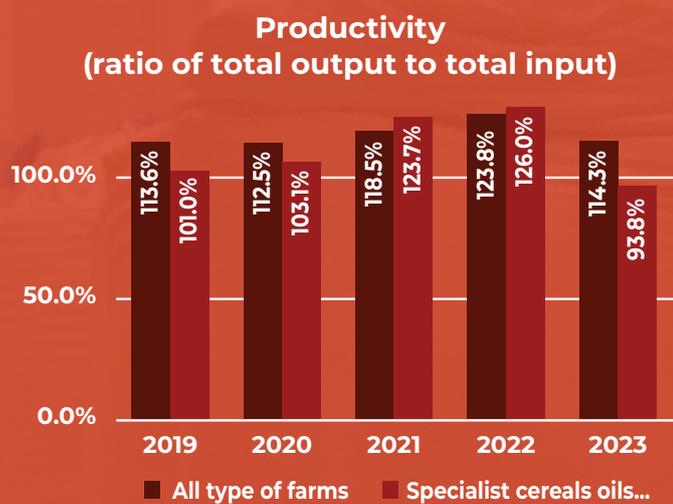
**Copa and Cogeca therefore put forward the following proposals to ensure that the Fertiliser Action Plan fully reflects farmers' agronomic and economic realities. Under specific costs, the share of fertilisers rose from 44% to 53% between 2019 and 2023. In 2023, productivity on specialist cereals farms lagged behind that of all farm types and declined compared with 2019 and 2020.**

Evolution of specific crop costs 2019-2023



Source: EC, DG AGRI, Agri food data portal, Copa-Cogeca

**In 2023, productivity on specialist cereals farms was lower than that of all farm types and lower than in 2019 and 2020.**



Source: EC, Dg Agri, Agri-food data portal

Fertilisers account for 10.6% of total intermediate consumption (€/farm) on average, which represents a significant expenditure for certain types of farm. For example, for crop-specialised farms, such as those growing cereals and oilseeds, fertilisers make up about 28.5% of total intermediate consumption (€/farm), according to 2023 FADN data.

European farmers and cooperatives need a secure and regular trade flow of affordable fertilisers to guarantee agricultural production and food security at competitive prices.

The shortage of nitrogen fertilisers, combined with extremely high prices, is already undermining basal fertilisation practices. This situation weakens soil fertility and threatens the long term productivity of European agricultural land.

While Copa and Cogeca acknowledge the geopolitical motivations behind the sanctions against fertiliser imports from Russia and Belarus, it is European farmers who will ultimately bear the economic fallout, and they cannot be left to absorb these consequences without adequate support measures. Considering the upcoming 20th sanctions package against Russia and Belarus, as well as the effects of recent sanctions on fertiliser imports from these countries, Copa and Cogeca explicitly call on the Commission not to impose a ban on fertiliser imports. This is to prevent a detrimental impact on European agricultural production and, consequently, on the EU's food sovereignty.

The Action Plan must prioritise supply security, increased utilisation of organic sources of nutrients, the development of a strong EU domestic mineral and organic fertiliser industry across all Member States as well as import diversification. It must improve access to fertilisers and their affordability for European farmers.



## Short-term measures

### 1. SECURING SUPPLY THROUGH IMPORT DIVERSIFICATION

In 2021, the EU imported approximately 26 million tonnes of nitrogen, phosphorus, and potassium fertilisers and related intermediates, with imports representing a substantial portion of total consumption: around 30 % of nitrogen, 68 % of phosphorus, and 85 % of potassium fertilisers are sold within the EU. This highlights the EU's strong dependence on external suppliers to satisfy domestic demand.

Data also indicate that the share of imported mineral nitrogen fertilisers has been increasing, rising from 28 % in 2019 to 45 % in 2022. At the same time, EU exports remain relatively small and do not compensate for this reliance, confirming that the EU imports significantly more fertilisers than it exports.

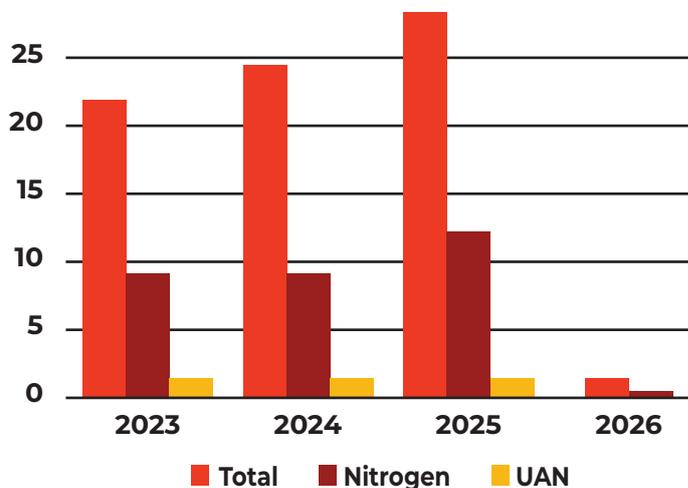
Since the introduction of sanctions on fertiliser imports from Russia, fertiliser prices in the EU have increased sharply<sup>1</sup>. Article 2(2) of Regulation (EU) 2025/1227 provides the Commission with a legal basis to respond appropriately to excessive price increases, including the temporary suspension of import tariffs on fertilisers originating from countries other than Russia and Belarus. Currently, ad valorem import duties of 6.5% apply to most nitrogen and compound fertilisers imported into the EU, including urea, ammonium nitrate (AN), UAN, calcium ammonium nitrate (CAN), NP, and NPK fertilisers. **The Commission's proposal to temporarily suspend ad valorem import duties solely on ammonia and urea falls short. If sanctions on ammonia are implemented, this measure will do little to ease fertiliser prices for farmers who will, in turn, continue to face severe cost pressures.** Suspending the Most Favoured Nation (MFN) ad valorem duty on UAN should automatically trigger the suspension of the existing antidumping duties on UAN imports from Trinidad and Tobago and the United States. These duties were extended on 7 January 2026 despite market analyses showing no credible justification for their continuation, making their persistence increasingly difficult to defend from an economic or policy standpoint. Copa

and Cogeca therefore urge the Commission to immediately activate Article 2(2) and urgently propose the temporary suspension of ad valorem import duties on urea, UAN, DAP, MAP and NPK fertilisers (CN codes 3102 10, 3102 80, 3105 30, 3105 40 and 3105 20) for as long as there is a risk of market disruption. This would ease price pressures and safeguard affordable supplies.

### 2. CARBON BORDER ADJUSTMENT MECHANISM (CBAM)

Copa and Cogeca express serious concerns regarding CBAM-related measures proposed on 17 December 2025. **Unresolved CO<sub>2</sub> pricing uncertainties** are already discouraging imports and threatening fertiliser availability and affordability. **In January 2026, there were no imports of UAN.**

Monthly EU Fertiliser imports (million t) January 2023-2026



Source: Fertiliser Market Observatory, EC, Copa-Cogeca

With EU fertiliser stocks covering **only 40–50% of annual needs**<sup>2</sup>, Copa and Cogeca call on the Commission to:

■ **Immediately suspend CBAM for fertilisers** until pricing uncertainties are resolved and the impact of the CBAM on the agri-food sector is managed better without having to resort to the import of feed and food from third countries.

<sup>1</sup> See Price Monitoring Reports, EC

<sup>2</sup> Estimates by the Copa-Cogeca Working Party on Cereals

■ Introduce long-term mechanisms to **offset CBAM-related costs for farmers** to the agricultural community.

Urgent action is needed to offset CBAM cost impacts, safeguard fertiliser supplies, protect farm viability, and uphold EU food security.

Meanwhile, Copa and Cogeca seek clarification from the Commission on the use of the default value of 1.757 for UAN (CN 3102 80 00) imports from the United States<sup>3</sup>.

### 3. THE NITRATES DIRECTIVE

Copa and Cogeca underline that the objectives set out for this Action Plan, regarding nutrient circularity, fertiliser efficiency and the increased use of recycled nutrients, cannot be achieved without addressing the underlying regulatory framework. The Nitrates Directive (91/676/EEC) limits nitrogen application from manure to 170 kg N/ha/year. Copa and Cogeca underline that European livestock farmers have already made substantial investments to improve environmental performance.

The Nitrates directive has contributed to improving water quality, but it also limits the optimal use of fertilisers from organic sources, making the EU increasingly dependent on fertilisers. The use of fertilisers from organic sources presents no risk to achieving good water quality. For instance, in Flanders, it has been scientifically proven that increasing the use of animal manure to 250 kg N/ha does not lead to a negative environmental impact. Similarly, in Italy, full field applications of digestate (processed manure) showed that applying an equal amount of N to conventional fertilisation (300-400 kg/Ha of N) does not increase N leaching or N<sub>2</sub>O emissions, corroborating international literature (e.g. Wei et al., 2021)<sup>4</sup>.

A more region-specific and adaptable approach, reflecting local realities, would significantly improve both the practicality and effectiveness of the Nitrates Directive and promote the utilisation of organic sources of nutrients. **Copa and Cogeca**

**therefore explicitly call on the Commission to urgently adopt targeted amendments to the Nitrates Directive as part of the Fertiliser Action Plan and in line with the Commission's broader objectives on simplification and better regulation.** These changes should be based on the outcome of the evaluation of the Nitrates Directive, which should be concluded as soon as possible considering the pressing situation in the fertiliser market.

This effort should facilitate the increased utilisation of organic sources of nutrients by:

■ **Restoring agronomic principles such as base fertilisation.** For example, the nitrates threshold of 170 kg/ha N limit at parcel level is illegal.

■ **Increasing the threshold of the Nitrates Directive.** Considering the specific local conditions where nitrogen is used could help enhance farm profitability while ensuring responsible nutrient use. **To improve fertility, the application of a specific amount per hectare of manure should be at least maintained at 170 kg N/ha or even increased, depending on the characteristics and needs of the soil and the plants. Copa and Cogeca have proposed targeted amendments to the Nitrates Directive (EN(25)02123rev.5 may be consulted upon request).**

■ **Reconsidering plant nitrogen requirement-based derogations for all Member States.**

■ **Promoting RENURE technologies and manure-derived technologies to reduce dependency on synthetic fertilisers.** Regrettably, the amendment<sup>5</sup> to the Nitrates Directive is not fully aligned with the RENURE criteria developed by the Joint Research Centre<sup>6</sup>. By laying down a restrictive list of approved production methods ('processing treatments'), the amendment completely stifles innovation aimed at new, improved production methods. This is in direct opposition to the Commission's ambitions concerning competitiveness. **Furthermore, the Commission Directive (EU)**

<sup>3</sup> COMMISSION IMPLEMENTING REGULATION (EU) 2025/2621 of 16 December 2025 laying down rules for the application of Regulation (EU) 2023/956 of the European Parliament and the Council as regards the establishment of default values.

<sup>4</sup> Wei et al. (2021). Organic inputs to reduce nitrogen export via leaching and runoff: A global meta-analysis- Environmental Pollution, 291, 11817, <https://doi.org/10.1016/j.envpol.2021.118176>

<sup>5</sup> COMMISSION DIRECTIVE (EU) 2026/288 of 9 February 2026 amending Council Directive 91/676/EEC as regards the use of certain fertilising materials from livestock manure.

<sup>6</sup> <https://publications.jrc.ec.europa.eu/repository/handle/JRC121636>

**2026/288 introduces a new limitation of 80 kg N/ha/year for RENURE (Annex III, point 2. C) which raises additional concerns.** As the key characteristic of RENURE is that the products are or behave identically to synthetic fertiliser, no such limitation should be included. Other issues need also be addressed. For a fuller review of adjustments to the amendment which would allow farmers throughout the EU to improve circularity of nutrients, we refer you to our contribution to the consultation <sup>7</sup>. **Copa and Cogeca call for RENURE criteria to be brought into line with the recommendations of the JRC in general and with the principle of technological neutrality in particular via a new revision.**

■ **Allowing the safe use of digestate, above the threshold of Nitrates Directive.** Digestate contains a higher percentage of readily available minerals (e.g. nitrogen) than in raw manure, meaning **the digestion process increases the fertilising value of the manure.** Evidence indicates that the liquid fraction of digestate can even substitute synthetic nitrogen fertilisers without crop yield losses. Organic matter of digestate is biologically stable and easily fulfils biological stability criteria established for fertilisers (e.g. compost and digestate) as per the EU Fertiliser Products Regulation (UE) 2019/1009. **Due to digestate containing less biodegradable organic nitrogen – the part which continues to mineralise over time – than raw manure, there is a lower nitrate leaching risk.** Compared to synthetic fertilisers, the risk has often been proven to be equal or even sometimes lower than synthetic fertilisers. The liquid fractions of digestate compliant with the RENURE criteria are considered safe for the environment by the Joint Research Centre <sup>8</sup>. Moreover, the risk can be mitigated with appropriate agronomic practices in terms of timing, application, and digestate storage. **Digestate, when applied to agricultural land, also helps maintain or increase organic carbon content in the soils.** With 60% to 70% of European soils considered unhealthy, digestate can bring additional benefits to various soil ecosystems services (crop yield, biodiversity habitat, water retention) but also sustain carbon sequestration. **Therefore, Copa and Cogeca demand that the use of digestate above the thresholds set by the Nitrates directive be authorised as soon as possible.**

■ **Supporting cooperatives in sustainable manure management is crucial,** as cooperatives enable farmers to pool resources for manure treatment as well as transport and valorisation, facilitate the large-scale deployment of RENURE solutions, improve nutrient recycling and reduce farmers' dependence on costly mineral fertilisers while ensuring compliance with environmental requirements.

#### 4. MARKET MONITORING

Copa and Cogeca support stronger transparency in the fertiliser market, starting with the timely publication of official statistics on accurate fertiliser prices, sales, and stocks, as well as a clearly defined list of reference fertilisers that accurately reflects EU and Member State market conditions.

Full clarity is also needed on how production costs are passed along the supply chain to farm level prices, ensuring that measures such as suspending MFN tariffs genuinely translate into lower costs for farmers.

The Fertiliser Market Observatory should also provide a specific breakdown of decarbonisation related costs, including those linked to the ETS for EU producers and the CBAM for importers. The creation of the Fertiliser Market Observatory is a welcome step in the right direction. However, the market remains highly opaque, to the clear detriment of farmers, and a significant imbalance persists between supply chain operators and the farming community.

Anti dumping investigations do also benefit from increased market transparency, as the current lack of reliable and accessible data undermines their robustness and credibility.

For these reasons, Copa and Cogeca call for stronger action to enhance market transparency across Member States and to ensure the continued development and effective use of the European Fertiliser Market Observatory.

Cooperatives, as major actors in fertiliser distribution, must be fully empowered to contribute to transparent market discovery and provide reliable monthly price information to farmers at Member State level.

<sup>7</sup> Consultation input from: Copa-Cogeca; European Biogas Association; CEMA

<sup>8</sup> Joint Research Centre study "Technical proposals for the safe use of processed manure above the threshold established for Nitrate Vulnerable Zones by the Nitrates Directive (91/676/EEC)".

The Commission should provide a fertiliser balance sheet for the most used fertiliser products.

## 5. FERTILISER USE EFFICIENCY

Copa and Cogeca support the objective of improving fertiliser-use efficiency across the EU, considering differences between crops, regions, and farming systems. Progress should be driven

by agronomic performance, advisory support, and innovation, rather than uniform quantitative targets. Any efficiency objectives should be based on measurable agronomic indicators and realistic baselines and should not result in any additional administrative burden for farmers.



## Mid-Term Measures

### 6. STRENGTHENING BIO-BASED FERTILISERS AND NUTRIENT CIRCULARITY - THE 2025 EU BIOECONOMY STRATEGY

Bio-based fertilising products, including recycled nutrients and bio-based compounds, and the development of biostimulants play a crucial role in reducing import dependency, lowering emissions, and improving soil fertility. A functioning circular economy for nutrients must be supported by enabling legislation and investment.

The **2025 EU Bioeconomy Strategy** is a key instrument to support sustainability, the transition from fossil to biogenic (raw) materials and represents an opportunity for additional value-creating markets for land and forest owners. The strategy can accelerate innovation, the development and uptake of bio based fertilisers, create lead markets, and improve regulatory clarity for bio-based products derived from livestock manure, biogas digestate, agricultural residues, and organic waste. Such measures can **increase domestic production of both organic and mineral-like fertilisers, reduce dependence on imported mineral nitrogen and phosphorus, and enhance circular nutrient management.**

To make these opportunities effective for farmers, Copa and Cogeca call on the Commission to:

- **Provide investment support** for demonstration projects and the scaling of bio based fertiliser production, mobilising EU, national, and private funds.

- **Simplify and harmonise authorisation procedures** for bio based fertilisers across all Member States.

- Ensure that bio-based fertilisers are **economically accessible to farmers** who are price takers and cannot absorb additional costs. **The direct use of bio-based fertilisers on land should encourage keeping farmers cost low (e.g. direct use of digestate), leaving more sophisticated and costly technologies to be used to export nutrients.**

- Foster **EU strategic autonomy** in fertiliser supply while supporting rural growth and new agri-industrial value chains.

- **Integrate bio based fertiliser production into existing biogas plants and nutrient recycling systems**, creating synergies with decentralised green ammonia and renewable energy production as also recalled in the resolution of the European Parliament of 16 February 2023 “Availability of fertilisers in the EU” at point 34<sup>9</sup>. Capturing evaporated nitrogen from current installations, such as biogas units and wastewater treatment plants, is essential as nitrogen remains one of the EU’s most critical resource challenges.

<sup>9</sup>Point 34 second paragraph of the EP resolution 16 February 2023 states: “Calls on the Commission to make new proposals to boost the deployment of small- and medium-scale biogas plants to produce fertilisers and energy all over Europe and with a strategic regional focus, in order to support farmers to create a sustainable EU value chain which will lessen the EU’s dependency on third countries; notes that the increase in the number of anaerobic digestion plants in agriculture, the main strategic purpose of which is the production of biomethane and digestate, should not take place solely at the expense of CAP funding;”

By aligning the Fertiliser Action Plan with the EU Bioeconomy Strategy, the EU can **deliver both climate and food security objectives**, while promoting innovation and the economic viability of European farms.



## Long-term measures

### 7. BUILDING A COMPETITIVE EU DOMESTIC FERTILISER INDUSTRY AND GREEN AMMONIA PRODUCTION

Copa and Cogeca stress that the Fertiliser Action Plan must aim to **build and maintain a strong EU domestic fertiliser industry across all Member States**. Reducing external dependencies requires geographically balanced production capacity for mineral, low-carbon and bio-based fertilisers, ensuring resilience, territorial cohesion, and supply security throughout the Union.

Copa and Cogeca support the development of **decentralised, on-farm and regional green ammonia production systems**, enabling farmers and cooperatives to produce fertiliser and carbon-free fuel locally.

Emphasis should be placed on the **synergies between green ammonia production, biogas plants, and electrolyzers using renewable energy**. Integrated systems allow renewable energy and recycled nutrients to be locally converted into green ammonia, strengthening nutrient circularity and improving economic viability.

However, Copa and Cogeca underline that the **green transition of mineral fertilisers must be economically viable for farmers**. Farmers are **price takers** on agricultural markets and cannot pass on higher input costs. If green fertilisers are not affordable, farmers cannot purchase them.

Copa and Cogeca therefore call on the Commission to:

- Recognise domestic fertiliser production and green ammonia as **strategic pillars** of the Fertiliser Action Plan.

- Support balanced fertiliser production capacity in **all Member States**.

- Provide **dedicated investment support** mobilising EU, national and private funding.

- Support pilot projects and scaling-up of **biogas-renewable energy-electrolyser-green ammonia systems**.

### 8. TRADE POLICY AND FERTILISER MARKET STABILITY

Trade policy must be a **core pillar of the Fertiliser Action Plan**. Fertilisers are strategic agricultural inputs, and trade measures directly affect farm production costs and food security.

Copa and Cogeca stress that in **all EU bilateral and regional trade agreements**, the Commission should systematically include **duty-free tariff-rate quotas (TRQs)** for key fertilisers.

These duty-free TRQs would improve supply predictability, support diversification of sources, mitigate price volatility and safeguard fertiliser affordability for farmers.

Trade policy must also support the green transition **without undermining affordability**. Sustainability and climate-related trade measures must not result in higher fertiliser prices for farmers, who are unable to absorb such costs.

Finally, trade policy must complement the development of a **strong EU domestic fertiliser industry**, contributing to open strategic autonomy rather than creating new dependencies.

Agricultural cooperatives should have access to tariff-rate quotas (TRQs) for fertiliser imports from third countries where energy costs are lower, enabling them to secure more affordable supplies for farmers.

## 9. RISK MANAGEMENT TOOLS

Volatility in fertiliser markets creates a structural risk because **buyers and sellers have almost no access to the financial tools that other commodity sectors use to stabilise prices.** With no liquid futures market or widely adopted hedging instruments, fertiliser prices move sharply in response to energy costs, geopolitical shocks, export restrictions, and seasonal demand. Market participants are forced to absorb these swings directly, relying on ad hoc contracts or timing strategies rather than formal risk management mechanisms. The result is a system in which farmers face unpredictable input costs that could otherwise be smoothed through standardised financial markets.

## 10. STOCKPILING STRATEGY: ENSURING SUFFICIENT RESERVES TO STABILISE AFFORDABLE FERTILISER SUPPLY

The European Union remains the world's leading agricultural and agri food power: it carries weight in international trade, sets global standards, and strongly shapes regulatory frameworks. Yet, it does not possess a genuine doctrine of food security in times of crisis. In a global environment marked by multiplying risks and growing unpredictability, the EU is beginning to question the true foundations of its power and the sectors that are essential to its sovereignty.

In the event of a major conflict, a prolonged energy supply disruption, logistical paralysis, a large scale cyberattack, an extreme climate event or a sanitary crisis affecting production, **who can truly guarantee that Europeans will be able to feed themselves for several months without suddenly facing drastic emergency measures?** As of today, the answer is clear: **Nobody. And certainly not in a coordinated way at European level.**

The EU continues to assume that crises are inherently temporary. However, the current era is evidence to the contrary: persistent polycrises, protracted conflicts, geopolitical fragmentation, weaponisation of dependencies, and the use of food as a strategic lever to name but a few. In normal times, markets function efficiently; but in times of chaos, they become insufficient and blind.

The EU must acknowledge its critical dependencies, food and fertilisers being prime examples.

**Building decentralised fertiliser stocks - contracted with private operators, regularly renewed, and governed by clear legal rules - must now become a core element of strategic planning and, ideally, be integrated into the Fertiliser Action Plan. Stockpiling is not a market management tool; it is a resilience measure. It should rely on cooperatives and farmers to cover at least three months of needs, supported by dedicated public funding outside the CAP.**



# Well-functioning EU single market

## 11. FERTILISER PRODUCT REGULATION (FPR)

### ■ Cadmium limits in phosphate fertilisers.

Regulation (EU) 2019/1009 introduces a maximum cadmium limit of **60 mg/kg P<sub>2</sub>O<sub>5</sub>** for CE-marked phosphate fertilisers.

Several Member States apply stricter national limits under derogations, which leads to disruption in the Single Market and entails higher costs, reduced sourcing flexibility and, ultimately, increased fertiliser prices for farmers. The European Commission must take all necessary measures to ensure that the Single Market for fertilisers functions more effectively.

### ■ Animal by-products CMC 10

Because the FPR does not define end points for many animal origin materials (other than processed manure), these materials cannot be used in CE marked EU fertilisers. This undermines the circular economy potential that the FPR originally sought to realise by recycling organic nutrients back into fertilisers.

## 12. COMPETITION LAW ENFORCEMENT

Market concentration and suspected anti competitive practices in the EU fertiliser sector continue to distort the internal market and place

disproportionate pressure on farmers. These structural imbalances risk restricting competition, inflating production costs, and undermining the resilience of EU agriculture. **Copa and Cogeca call on the European Commission to conduct a thorough and urgent investigation into potential breaches of EU competition law with scrutiny of dominant position abuses and excessive market consolidation.** Any infringement must, of course, be proven through a rigorous assessment. Where non compliance is established with evidence, the Commission must intervene decisively and apply all necessary corrective measures to restore fair competition, ensure price transparency, and safeguard the proper functioning of the Single Market.

## 13. A DIRECTIVE ON UNFAIR TRADING PRACTICES (UTPS) IN AGRICULTURAL INPUTS

In addition to the enforcement of competition law, new legislation prohibiting unfair trading practices in the fertiliser sector and other agricultural inputs must also remain available as a policy instrument. Unlike the Directive on unfair trading practices (UTP Directive), any new legislation should be established separately in order to avoid unnecessary complexity and to preserve the legal basis (Article 43§2 of the TFUE) of the existing UTP Directive (EU) 2019/633 under the responsibility of DG AGRI.





**copa\*cogeca**

european farmers   european agri-cooperatives

**61, Rue de Trèves  
B - 1040 Bruxelles**

**Telephone**

00 32 (0) 2 287 27 11

**Telefax**

00 32 (0) 2 287 27 00

**[www.copa-cogeca.eu](http://www.copa-cogeca.eu)**

**Copa and Cogeca, founded respectively in 1958 and 1959, form the united voice of farmers and agri-cooperatives in the EU.**

**Copa members represent leading farming unions at national level, speaking for millions of farmers across Europe. Cogeca members represent the interests of the thousands of agricultural cooperatives in Europe.**

**Our democratic organisations, led by elected representatives, embody the vibrant diversity of European agriculture across all 27 EU Member States.**

**We are the collective voice of farmers and agricooperatives of all sizes and specialisations dedicated to the daily production of crops, livestock or mixed farming, encompassing both conventional and organic practices. Together, we ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe and contributing to reducing food insecurity globally.**