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## Written Contribution of European Coordination Via Campesina- ECVC

### IMPLEMENTATION DIALOGUE

on the

### Nitrates Directive, the Water Framework Directive and the 'Nature' Directives

*European Coordination Via Campesina (ECVC) is a confederation of unions and organisations of peasant farmers, small and medium-scale farmers, and agricultural workers across Europe. We are currently composed of 28 national and regional peasant farmer organisations from 20 European countries.*

From ECVC's perspective, the current difficulties faced by farmers are not caused by environmental directives. Farmers are facing structural problems: price pressure, unfair trade agreements, intensification, concentration of livestock, climate change impacts, and water scarcity. These are the real drivers of instability in rural areas.

As farmers, our main difficulty is not completing nutrient management plans, which are often useful from an agronomic perspective. Our primary challenge is economic instability caused by price volatility and overproduction. In sectors such as dairy, European overproduction directly contributes to price collapse. At the same time, trade agreements increase competitive pressure. These structural issues, not environmental directives, are the root causes of farm instability. Recent protests across Europe also confirmed that trade agreements, price pressure and structural imbalances are our problems, not water or nature legislation.

The Nitrates Directive, the Water Framework Directive and the Nature Directives are fundamental for protecting water quality, biodiversity and public health. They have already been evaluated and found fit for purpose. Reopening them would create legal uncertainty, especially for farmers who have already invested to comply.

Reopening directives risks shifting responsibility away from structural causes and weakening protections that safeguard drinking water, biodiversity and public health.

At the same time, farmers currently locked into highly industrialised systems, must not be left alone to bear the transition costs. Strong environmental rules must be combined with fair prices, coherent CAP instruments and public investment that allow farmers to change practices without disappearing. Simplification should mean clarity and coherence, not lower environmental standards.

**Q1: What are the practical difficulties of the implementation of the directives, in particular for primary producers? Please illustrate with concrete examples, regarding e.g. coherence, complexity, effectiveness. Please describe the impact of these difficulties**

The main issue is not the objectives of the directives, but uneven and incoherent implementation.



Farmers face a fragmented and complex regulatory framework, often poorly coordinated between CAP rules, water basin authorities and environmental legislation. Nitrates requirements, Water Framework obligations, Habitats constraints, CAP conditionality and regional programmes often overlap without sufficient coherence. This regulatory layering creates complexity and administrative pressure without necessarily improving environmental outcomes.

In practice, several implementation problems illustrate that the issue lies in national application rather than in the directives themselves:

- Numerous derogations allow highly industrial livestock farms to bypass common rules, undermining fairness and environmental effectiveness.
- Farms with low stocking densities and large shares of grassland are often treated in the same way as highly intensive livestock operations, despite very different environmental impacts.
- The exclusion of mineral nitrogen from the 170 kg/ha limit creates inconsistencies and raises concerns in the field.
- In newly designated vulnerable zones, insufficient public funding to support compliance investments risks turning environmental requirements into restructuring tools, accelerating the disappearance of small farms.

More broadly, water pollution is treated too narrowly and generates major public costs. Nitrate pollution is often addressed at farm level, but the structural drivers are territorial: concentration of livestock, separation of crop and animal production, dependency on imported feed and synthetic fertilisers. This creates nutrient imbalances and water stress that individual farmers cannot solve alone.

In some regions, we face an incoherent model: importing soy and chemical fertilisers from outside Europe to feed animals, while transporting manure hundreds of kilometres within Europe. Livestock systems must be adapted to the carrying capacity of territories. Territorial self-sufficiency should be the guiding principle.

Agriculture itself depends on clean water. implementation costs are uneven. Storage requirements, fertilisation adjustments, adaptation to vulnerable zones and water basin measures require investment. Without adequate funding and advisory support, compliance risks accelerating farm concentration, particularly harming small and medium farms.

Water resilience must therefore be addressed not only environmentally, but also socially and economically, ensuring access to water for agriculture while maintaining viable rural territories. Protecting water is in the interest of farmers.

***Q2: What could be improved to reduce the burden resulting from implementing these directives, while maintaining their effectiveness?***

Simplification must not mean deregulation.

ECVC does not support reopening the Nitrates Directive. The need is to close implementation gaps and ensure coherence between environmental directives and CAP instruments.

Experience with recent CAP simplification measures shows that frequent rule changes create significant uncertainty at farm level. When rules change too often, farmers hesitate to invest.



Reopening environmental directives would generate similar instability and undermine those who have already adapted. CAP must provide stronger support for transition, including advisory services, investment aid and territorial planning that addresses excessive livestock concentration and nutrient surpluses. Farmers trapped in intensive systems must not be left alone to carry the costs of change.

Weakening thresholds or expanding RENURE risks locking farmers into industrial livestock systems rather than solving nutrient excess.

Improvements should focus on:

- Better coordination between environmental legislation and CAP support tools.
- Stronger public investment in advisory services, training and transition support.
- Territorial planning that addresses excessive livestock concentration and nutrient imbalances.
- Ensuring that environmental compliance does not become a restructuring tool favouring large-scale operations.

We cannot ask farmers to reduce environmental impacts while other public policies continue to encourage concentration, specialization, export competition and production growth. Environmental legislation must be coherent with CAP reform, trade policy and the upcoming Livestock Strategy.

Agroecological systems offer concrete solutions. Practices such as legumes, longer rotations, permanent grasslands, mixed crop-livestock systems and reduced stocking densities improve nutrient efficiency, enhance soil health, increase water retention and strengthen biodiversity.

**Q3: *What measures could stimulate innovation and new business models (for example, recycled nutrients, biogas etc)?***

Innovation should not be reduced to technological fixes to maintain the same model.

Real innovation lies in territorial food systems, pasture-based livestock systems adapted to regional ecosystems, lowering animal densities where necessary, reducing dependency on imported feed and synthetic fertilisers, restoring territorial balance between crops and livestock, agroecological systems adapted to regional realities.

**European policy should focus on reducing systemic dependencies in our agri-food system. The upcoming Livestock Strategy and CAP reform must address territorial concentration, overproduction and input dependency. Building resilient food systems requires more farmers, healthy ecosystems, regionalised production systems and reduced reliance on volatile global markets.**