

Ref. LETTER(25)00646 – DDJ/lb

Minister of Trade

Brussels, 12th March 2025

Subject: Proposal for a Regulation on the modification of customs duties applicable to imports of certain goods originating in or exported directly or indirectly from the Russian Federation and the Republic of Belarus (COM(2025)34 final)

Dear Minister

Ahead of the vote on the Commission's proposal in COREPER on 14 March, Copa and Cogeca would like to reaffirm their position.

Copa and Cogeca, representing European farmers and agri-cooperatives to the EU, acknowledge the geopolitical factors influencing the European Commission's decisions, and recognize that these decisions are driven by broader global considerations.

However, despite understanding these political imperatives, there will be consequences for European farmers. The immediate impact of the proposal has been to see the market factor in the additional costs of Russian supplies.

Copa and Cogeca highlight the absence of an impact assessment accompanying this proposal, the lack of a medium- and long-term strategy to ensure the access of EU farmers to affordable fertilisers as well as the significant economic consequences these trade defence measures will have for European farmers and agri-cooperatives, which will also entail a significant impact on food security and ultimately food inflation.

Therefore, Copa and Cogeca propose several amendments to the Commission's proposal:

- A one-year deferral
- A reliable, automatic and effective safeguard mechanism
- Choice of CBAM or tariff-based trade defence measures against Russia and Belarus
- Higher quota rates
- Exclusion of N, P, K and N, P from the scope of application
- Annual review clause

These amendments must go hand in hand with an alternative diversification strategy for ensuring the availability of competitively priced fertilisers for European farmers and reducing dependency. This would include:

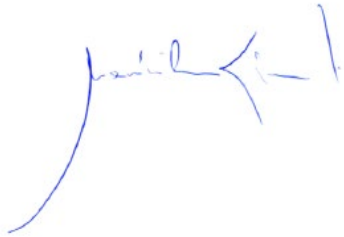
- Elimination of anti-dumping duties on imports of urea, ammonium nitrate, and UAN mixtures originating from the USA and Trinidad and Tobago.
- Suspend conventional duties on imports of urea, UAN, DAP, MAP, and NPK (codes 3102 10, 3102 80, 3105 30, 3105 40, and 3105 20 from the tariff nomenclature).
- Grant derogations under the Nitrates Directive to allow the use of processed livestock effluents (RENURE - Recovered Nitrogen from ManURE and certain digestates) beyond the current limit of 170 kg N/hectare.



Please find Copa and Cogeca's position at this link: <https://copa-cogeca.eu/publications>

We kindly ask for to consider these amendments and proposals and look forward to working together on finding solutions that do not put at risk EU's food security and benefit both the agricultural sector and broader geopolitical objectives.

Yours faithfully,



Massimiliano Giansanti
President of Copa



Lennart Nilsson
President of Cogeca

