



EU Transparency Register n° 54109452255-29

29 November 2013 - To the European Commission env-use-of-phosphorus@ec.europa.eu

Response to the “Consultative communication on the sustainable use of phosphorus”

http://ec.europa.eu/environment/consultations/phosphorus_en.htm

The European Sustainable Phosphorus Platform welcomes the European Commission’s consultative communication, which outlines well why phosphorus stewardship is essential to Europe’s sustainable development, innovation and industry and food security.

Phosphorus is a non-substitutable resource, vital for Europe and for the world’s food production (over 90% of world phosphate rock use), but also in much smaller quantities for a range of industrial applications including cleaning and hygiene, food preservation, electronics, metal corrosion protection, ceramics, fire safety, medical applications ...

The EU’s material and resources policies should address stewardship and security of supply of both phosphorus in general (in particular for agricultural food production) and specific forms of phosphorus needed for certain strategic, value-added industry sectors.

Phosphorus stewardship and recycling should be integrated into the EU’s existing policies.

Phosphorus stewardship targets should be defined in EU raw materials and resources policies, the development of the bio-economy (impossible without P-recovery and P-recycling), sector policies for waste, water, agriculture and food, research and innovation.

Specifically, phosphorus stewardship should be part of **European Innovation Partnerships (EIP)** on agricultural productivity and sustainability, water, raw materials, and also for certain specific aspects smart cities and active and healthy ageing.

Phosphorus stewardship can offer **important synergies with other policies**, in particular reducing eutrophication problems (water quality), reducing or recycling food waste, reducing landfill (avoiding landfill of phosphorus-rich products such as sewage sludge incineration ash), improving economics of farming, sustainability of bio-resource and bio-energy production.

The European Commission should facilitate a clear, long-term policy framework. This stable policy framework is essential to enable industry, local authorities and other stakeholders to invest in phosphorus management (including efficiency in use, reuse, recycling, and recovery). Targets or objectives, incentives, regulatory frameworks need to be stable and coherent.

Policies should be designed to ensure that European farmers or industry are not unfairly penalised: for example, if contaminants (e.g. cadmium) in fertilizers is limited in the EU to protect consumers, also the content of contaminants in imported foods and animal feeds should be considered.

Figures and data are needed on the **competitive impacts, economics and job creation** resulting from phosphorus use efficiency and recycling. More generally, a European **knowledge integration and implementation agenda** should be defined regarding phosphorus stewardship, to improve transfer of information between different sectors and specialisations, to communicate existing knowledge and facilitate implementation, and to identify key knowledge gaps where further research, development or demonstration is needed.



Europe should continue to develop long-term cooperation with phosphate mining countries (in particular Morocco, as a 'neighbour') for mutual gains through development of more efficient and more sustainable mining and processing of phosphate rock, quality and stability of supply.

The European Commission can **facilitate phosphorus stewardship by integrating legal frameworks and ensuring regulatory coherence**, including taking phosphorus efficiency and recycling into account in different existing regulations and policies (agriculture, water, waste, innovation ...) and adapting policies for the **development of a circular economy**.

Phosphorus stewardship is challenging and cross-sectoral, **requiring to build links and cooperation between actors** involved in different sectors: agriculture and food production, waste and water treatment, fertiliser and chemical industries, as well as with technology suppliers, scientists and consumer and environmental stakeholders Synergies and mutual gains are possible, through recycling, waste as a resource, resource savings and reductions in phosphorus pollution, provided that innovation can be brought to implementation, both in technologies and in social and economic systems, in particular **demonstrating and disseminating cost-effective technologies and successful business cases**.

For these reasons, **collaboration and awareness raising are both very important**, both in regions of Europe which are already active in addressing phosphorus management (e.g. because of high livestock or population concentrations and so regional nutrient surpluses, or because of sensitivity of waters such as the Baltic to nutrient inputs), and in regions of Europe where phosphorus is to date less recognised as an issue (but significant opportunities exist as infrastructures such as waste water treatment installation or upgrading).

Communication of **experience of frontrunners, innovators and successful business cases (often involving SMEs with new technologies or approaches) should be encouraged**, and helped to move to full-scale demonstration and testing.

The European Commission can contribute by contributing to awareness across Europe, by supporting meetings and information actions, and by supporting national and regional nutrient platforms and initiatives.

Nutrient or phosphorus Platforms, have already been established in The Netherlands, Flanders and Germany, and since March this year at the European level.

The **European Sustainable Phosphorus Platform** was launched at the European Sustainable Phosphorus Conference, Brussels, 6-7 March 2013, at which over 300 representatives of European institutions, EU Member States, industry, scientists, farmers' organisations and NGOs called for European action for phosphorus stewardship and recycling. The conference declaration called for the launch of a platform to continue dialogues, raise awareness and trigger actions to address the "Phosphorus Challenge" that has implications for ensuring food security, geopolitical stability and environmental sustainability. A second European Sustainable Phosphorus Conference is planned in Berlin 3-4 March 2015.



The conclusions of this first European Sustainable Phosphorus Conference were as follows:

1: Business development

- pilot projects
- sound financial engineering: eg. innovation loans, guaranteed funds, venture capital, bank financing
- integrating P management into other value created, eg. cost reduction

2: Cooperation

- dissemination of knowledge and experience
- connecting demand and supply, different waste streams, markets, logistics
- creating trust
- local value chains
- national nutrient platforms
- European Phosphorus Platform

3: Incentives for efficient use and for recycling

- identifying recycling targets
- landfill P targets
- certification

4: Awareness raising

- at public, political and professional levels

5: Knowledge, benchmarking, dissemination

- monitoring P flows, P reserves
- risk assessments, LCAs, decision support systems,
- contaminants
- agronomy, soil P status, plant breeding

6: Harmonisation of existing legislation

- Waste Framework Directive (End of Wastes status)
- REACH
- Fertiliser Regulation
- Nitrates Directive
- ...

7: Developing EU policies

- EU as a front runner, competitive advantage
- inclusion of P in the list of strategic raw materials,
- EIPs (European Innovation Partnerships): eg. water, raw materials, agriculture
- Integrating P recovery into overseas development aid policies

This is now being taken forward as the European Sustainable Phosphorus Platform www.phosphorusplatform.eu, bringing together stakeholders in the fertiliser, animal feeds, manure and biosolids, waste management, chemicals, food, farming and phosphorus recycling sectors.



The European Sustainable Phosphorus Platform has the following objectives:

- **Bring together knowledge and experience** necessary to strengthen innovation and process innovation through the EU for better stewardship of phosphorus, to recycle more and to create green jobs within the framework of a circular economy;
- **Contribute to formulating a knowledge integration and implementation agenda** which can be connected to the research and innovation agendas of Horizon 2020 and the EIPs on Raw Materials, Water and Sustainable Agriculture;
- **Circulate information and promote sustainable phosphorus management and related job creation;**
- Work together closely in the **precompetitive phase of innovation**, to exchange experience, best practice and benchmarking

The Platform is already receiving a very positive reaction, with many requests for information or contribution to meetings on related issues, and the context is moving rapidly. **Recent developments** include the launch of the German Phosphorus Platform (15th November 2013) and the German Federal Council voted motion in favour of a European and national phosphorus stewardship and recycling policies, P-recycling policy proposals in Sweden including strong discussions on implications for food safety, P-recycling targets announced in Denmark, sustainable nutrient objectives agreed by HELCOM (Baltic), stakeholder discussions underway concerning the integration of recycled phosphate products in the EU Fertiliser Regulation, REACH (application to 'recovered substances'), End-of-Waste (composts and digestates), EU Ecolabel (soil amendments) ...

The European Phosphorus Platform is one of a number of initiatives underway addressing sustainable phosphorus management across the world:

- **Japan:** has since 2008 a 'Phosphorus Recycling Promotion Council' with 150 company members.
- **USA:** National Science Foundation Research Coordination Network (RCN) "Coordinating Phosphorus Research to Create a Sustainable Food System", launch Washington DC, 13-17 May 2013 <http://sustainability.asu.edu/research/project.php?id=704>
- **Canada:** first meeting of a Canadian Council of Ministers of the Environment initiative "Framework for Management of Phosphorus as a Resource", 18th March 2013
- **National Nutrient Platforms:** [Netherlands](#) (2011), [Flanders](#) (part of Belgium, 2012), [Germany](#) (launched 15/11/2013) ... bringing together regulators, industry, stakeholders (ONGs, farmers)
- **Other:** the above are additional to the already ongoing global initiatives on or related to phosphorus management, such as: [P-REX](#) (EU funded P-recycling R&D Europe), [Global TraPs](#), [Bio-Refine](#), [Global Phosphorus Network](#) / GPRI, [Global P Summit](#) ...

The European Sustainable Phosphorus Platform's **actions underway** include: work with stakeholders on regulatory questions around sale and use of recycled phosphate products (see SCOPE/ESPP Newsletter n° 98 on www.phosphorusplatform.eu) ; stakeholder meeting on how to recycle phosphorus whilst ensuring food chain safety (Sweden/Denmark early 2014) ; specific work on integration of recycled phosphates and phosphate containing organic products (produced from manures and biosolids) into the EU Fertiliser Regulation ; application of Art. 2(7)d ("recovered" substances) to recycled phosphate products in the EU chemical regulation REACH ; participation in conferences and meetings concerning water, resource recycling, phosphorus management, fertilisers ; circulation of information concerning phosphorus management (SCOPE Newsletter, www.phosphorusplatform.eu, Twitter @phosphorusfacts), preparation of joint proposals concerning phosphorus for calls and tenders, definition of research integration and implementation agenda on phosphorus management ...