



ESPP input to EU consultation on the Waste Framework Directive

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ESPP (European Sustainable Phosphorus Platform) supports the need to improve waste prevention and separate collection. In particular, separate collection of (non-avoidable) food waste and organics is important (including from caterers, restaurants), in order to enable recycling of phosphorus, other nutrients and organic carbon, by e.g. composting, anaerobic digestion and valorisation of digestate and/or nutrient recovery.

Legally binding targets for waste prevention, separate collection and reuse/recycling should be introduced, applicable to local authorities responsible for waste management. A legally binding maximum % organics in the residual municipal solid waste stream would be an effective way to ensure separation of valorisable organics and food waste as well as inciting waste prevention.

The legal definitions and status of separately collected food waste, catering waste and green waste should be clarified (inc. for “biowaste”) to avoid obstacles to recycling and to valorisation of recovered nutrients in e.g. fertilisers, animal feed or other applications.

The current WFD definition of “bio-waste” (art. 3.4) is: “biodegradable garden and park waste, food and kitchen waste from households, restaurants, caterers and retail premises and comparable waste from food processing plants”.

ESPP suggests to add organic wastes from animal feed processing plants.

ESPP underlines the need for clear EU Guidance on what is and is not “bio-waste”. We note that the two links to Guidance (“General Guidance” and “Bio-waste Guidelines”) on the Commission’s web page are currently ‘down’. (links on this page https://ec.europa.eu/environment/topics/waste-and-recycling/biodegradable-waste_frln particular, Guidance is needed on the interpretation of “comparable” and on the inclusion or not of materials such as flotation sludges from food or animal feed processing plants.

This Guidance is important because the term “bio-waste” is used in the Fertilising Products Regulation 2009/1009 to define which materials can be taken in to anaerobic digestion (biogas) or compost processes to produce CE-fertilisers.

ESPP underlines the significance of avoiding food waste and recycling unavoidable food waste for stewardship of the EU Critical Raw Material “phosphate rock” and for climate change:

- global food waste is estimated to contribute 8% of anthropogenic greenhouse emissions www.phosphorusplatform.eu/eNews052

- Papangelou et al. estimated c. 130 tP/y/million people lost in food waste in Brussels = c. 60 000 tP/y for the EU27 www.phosphorusplatform.eu/eNews047

- Nestlé and WRAP UK estimate that phosphorus in food waste represents 120 days of nutrition P requirements www.phosphorusplatform.eu/eNews036

- If the phosphorus footprint (used in upstream production) of food waste is considered, then losses due to food waste are even more significant: Li et al. estimated the P-footprint of food waste in China as 16% of fertiliser use www.phosphorusplatform.eu/eNews040