

To:-

**Hans Ingels, Head of Unit Chemicals, Bioeconomy and Retail, DG GROW.,**

- copy: Theodora Nikolakopoulou, Fertilisers.

**Peter Wehrheim, Head of Unit Bioeconomy & Food Systems, DG RTD**

- copy: Silvia Maltagliati, Bioeconomy

**François Wakenhaut, Head of Unit Circular Economy and Secondary Raw Materials**

- copy: Sylvie Grajales

Brussels 19<sup>th</sup> April 2026

**Preparation EU Circular Economy Act – request for meeting**

Dear Mr Ingels, dear Mr Wehrheim, dear Mr Wakenhaut,

**We kindly request a meeting to discuss possible developments to EU waste regulation to facilitate the Circular Economy and Bioeconomy innovation.** ESPP's aim is to make positive proposals, based on the experience of our members who cover a wide range of industries and stakeholders, from waste management to fertiliser users. Our objective is to prepare input the Circular Economy Act and to future discussions in Parliament and Council. In particular, we would propose to discuss the following possibilities:

New 'intermediate' waste status for EU Nutrient Recycling Material (NuRM):

**Could there be a new 'waste for recycling' status for recycling materials which would enable EU market access, transport authorisation and site permitting, but would retain waste status, with traceability, producer cradle-to-grave responsibility, waste application plan and declaration?** This would allow rapid market access for innovative new recycling processes and material streams, in particular for bio-based secondary materials which are often locally specific. The regulatory modification process of the EU FPR and EU End-of-Waste are not adapted for these.

Conditions:

- ✓ recovered from waste
- ✓ nutrient supply function
- ✓ EU digital traceability system
- ✓ compliance with general safety criteria.

The EU End-of-Waste status of the FPR should be retained for products with EU-wide production and proven roll-out and the FPR PFC criteria should be applicable as general minimum safety criteria.

### Digital traceability, producer responsibility and Mutual Recognition

Traceability is today readily accessible for producer industries, logistics and end-users (farmers), with a QR-code and a smartphone. In the food chain, traceability is already widely operational, for quality control, commercial label and operational reasons. Valorisation with traceability, under 'Waste' status, is today operational under Member States fertilisers regulations for some secondary nutrient materials as well as for most nutrient valorisation routes for Animal By-Products. But export to other Member States is then impossible (in practice) and there is no EU market for the recycling process (technology, know-how).

**Could EU digital traceability and an EU cradle-to-grave produce responsibility system enable 'by default' Mutual Recognition of nutrient recycling materials,** with EU Notified Body certification of EU safety criteria and producer self-declaration of input materials and processing?

### IED site permitting for waste valorisation

**A number of companies have indicated that a significant obstacle to recycling is the necessity to modify the IED operating permit to enable a site to take in 'wastes' to substitute virgin process inputs:** complex and costly new dossier, refusal or conditions posed by licensing authorities ...

Can this be addressed, without compromising site safety, in the Circular Economy Act or in omnibus simplification packages ?

### Green Listing of wastes and nutrient materials intended for recycling

Would it be possible to 'Green List', for transport on the EU market, nutrient materials intended for recycling (processing) or for re-use (without processing) ?

In particular:

- (intended) EU Fertilising Product Component Materials,
- materials authorised for use as 'National' fertilisers in the recipient Member State,
- biorefinery residues and similar: from processing of plant materials; from production of human foods or animal feeds, bio-fuels, bio-materials (biochemicals, biofibres) and from biorefineries.

See ESPP's proposals submitted to the EU consultation on Green Listing in October 2025 (contribution code 362625f7-b5f7-4d41-9af3-7676cf90a244 document here [www.phosphorusplatform.eu/regulatory](http://www.phosphorusplatform.eu/regulatory) -> ESPP input green-listing wastes 30\_10\_25).

We very much hope that it will be possible to exchange on these ideas with you and your services and look forward to hearing from you.

Yours faithfully

Robert Van Spingelen, President

