

To the European Commission, DG GROW
Hans Ingels, Head of Unit Chemicals & BioEconomy

Copy: Theodora Nikolakopoulou, Fertilisers Unit, DG GROW

Brussels, 16 March 2026

Dear Mr Ingels,

ESPP organised on 25th February a webinar for members of ESPP and of Nutrient Platforms in five countries, with 105 participants online, on regulatory aspects of placing secondary nutrient materials on the market as fertilising products.

Four questions were spontaneously raised at this webinar, all of which have been raised before, suggesting that these are significant questions which today are not being adequately addressed or that solutions could be better communicated. We therefore feel useful to formally raise these to your attention as outstanding stakeholder and operator concerns:

1) Wool as an ABP in CMC of the FPR

Wool is cited in art. 46.4 of the FPR as one of the materials listed by Parliament and Council on which the Commission should act by January 2000 for possible inclusion to include into the FPR. Yet, wool does not appear in the “Technical proposals for draft amendments” of the QLab report (version circulated to Fertilisers Expert Group in May 2025).

Obviously, wool is intended primarily for use in clothing, insulation or technical fibres, but there will always be cases where quality, logistics or timing prevent this. Wool contains nitrogen and other plant nutrient minerals. To our understanding, wool is authorised as a fertiliser in some EU Member States, e.g. Netherlands.

Appropriate processing of the wool should be allowed. Some safety requirements may be appropriate, e.g. those proposed for feathers in the QLab report, possibly additional exclusion delay time from any veterinary skin treatment of the sheep.

Please can you indicate what action is envisaged by the Commission to study and to possibly include wool into CMC10 as suggested by art. 46.4 ?

2) Aquaculture sludge

Fish sludge contains significant tonnages of phosphorus (Critical Raw Material ‘Phosphate Rock’) as well as nitrogen, other nutrients and methane/bioenergy potential. Production is expected to increase considerably as open-net sea aquaculture is liable to be limited by issues of disease and pollution, pushing towards closed systems where sludge collection is possible or necessary.

It has been clarified by DG SANTE that “fish sludge” from aquaculture is a Cat2 ABP, despite fish manure being excluded from the definition of manure in 1069/2009. Fish sludge is thus excluded from the current NMI report on new materials in the FPR.

The FPR FAQ currently states correctly that fish sludge and (in our opinion incorrectly) that shellfish/crustacean aquaculture sludge are not covered by “Processed Manure” in CMC10.

We suggest to delete “shellfish sludge” as this has not to date been raised as a real-life concern.

It is our understanding that fish sludge is included in Cat2 ABPs authorised (under conditions) in CMCs 3, 5 and 1. If this is correct, we suggest to add this to the FAQ.

Given the significant nutrient recycling potential of fish sludge and the stakeholder interest, we request that the Commission engage proactive action to assess the safety of, define an ABP End-Point and include it into the FPR CMC10.

3) Other ABPs in CMC10

Webinar participants questioned why, more than six years later, the various ABPs cited in the FPR art. 46 are still not today included into CMC10. ESPP notes that the QLab study, including proposed amendments was concluded in early 2025.

Our understanding is that the draft Delegated Amendment to include the QLab proposals into CMC10 is expected to soon be finalised and opened to public consultation

We look forward to this progress.

4) Recovered additives

Stakeholders expressed concerns about additives. The conception of the FPR means that any deliberately added material, even at 0.01% of final product, is a CMC. This excludes many recycled and recovered materials being used as additives, because their use would require a new CMC and demanding requirements are made (contaminants, data) as if they were intended as a principal component of a fertilising material. This is illustrated by the NMI rejection of use of recycled lubricants as processing additives, obliging to use CMC1 additives (virgin chemicals).

Because such additives are used at low levels, the total material flow impact is low, but additives can be high-value specialist products, so that the value impact on Circular Economy may be significant.

ESPP repeats our request that the Commission address this question, and consider an amendment authorising additives below a certain % in the final product subject to appropriate general safety specifications, in particular: not Hazardous for chronic tox or ecotox.

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We remain at your disposition for any further information on these questions.

Yours sincerely



Robert Van Spingelen, President of ESPP