

To the European Commission - DG GROW, Fertilisers Unit

Brussels, 30th September 2026

Object: request for clarification in FPR FAQ concerning fish sludge

Dear Ms Nikolakopoulou, dear Fertilisers Team,

Thankyou for your detailed email of 25th June concerning certain ABPs and additives in the FPR.

We would like to suggest that the clarification given in this email concerning fish sludge and certain CMCs be transposed into the FPR FAQ.

At present, FAQ 8.41 states that, because the ABP Regulation 2009/1069 excludes “fish” from its definition of “manure”, this means that “fish aquaculture sludge and (b) shellfish/crustacean aquaculture sludge” are NOT covered by the CMC10 endpoint for ‘processed manure’.

- 1) We suggest that this wording of FAQ 8.41 requires modification. shellfish and crustaceans (mussels, oysters, shrimps, crayfish ...) are NOT “fish” [despite those four letters sometimes occurring in their English vocabulary!] but they are certainly “animals”, so their excrements are covered by and not excluded from “manure” under 2009/1069.

We request that FAQ 8.41 be modified to state only that “fish sludge from aquaculture” is excluded from CMC10 “processed manure”.

- 2) As indicated in your email of 25 June, and also in the email of Lazslo Kuster, DG SANTE 19 June, fish and aquaculture sludges are ABP Cat2. As per your email of 25 June, they can therefore be used as inputs to CMC3 composts (subject to the conditions specified in the ABP Regulations, in 2023/1605 and in the FPR), and we conclude also similarly that they can be used as inputs to CMC 5 (digestates) and CMC13 (ash-based), as well as input to CMC15-2-b (gas purification etc).

We request that the FAQ clarify (extension of 8.41 or a new item) that fish sludge from aquaculture can be used (under relevant conditions) as inputs to CMCs 3, 5, 13 and 15-2-b (but, as for other ABPs to date, not as inputs to CMCs 12, 14)

We hope that it will be possible for you to consider these requests and to propose FAQ texts to the next Fertilisers Expert Group.

This would be helpful to operators, investors and Member States for development of fish sludge nutrient and energy / organics valorisation.

Thanking you again for your ongoing engagement and support in implementation and improvement of the FPR!

Yours



Robert Van Spingelen, ESPP President