European Sustainable Phosphorus Platform
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Brussels, 25th July 2025

ESPP input to the EU Consultation "Critical raw materials – products, components and waste streams with a high potential to recover critical raw materials"

For the CRM Phosphate Rock (P), the European Sustainable Phosphorus Platform ESPP notes that the following materials, potentially significant for phosphorus recovery and recycling, are missing in the list proposed in the draft regulation annex:

- Animal manures and slurry – these contain in total a similar quantity of P to that used in mineral fertilisers.
- Agricultural run-off water, e.g. in tile or ditch drainage of fields. Agricultural drainage water contains significant quantities of P and P-trap systems have strong interest for eutrophication prevention and potentially enable P recovery or reuse.
- Food industry, dairy processing, slaughterhouse wastes – wastewaters - sludges and by-products, specifically including Cat1 Animal By-Product incineration ash.
- Spent ABC fire extinguisher powders (significant tonnages of ammonium phosphates).
- Metal processing liquors and 'spent' phosphoric acids.
- Dredging muds and sediments.
- Waste or by-product streams from processing of bio-fuels, bio-materials, biorefineries, etc.
- Algae and biomass grown in wastewater treatment systems or harvested (e.g. beach cleaning, biomass removal from canals …) and wastes or by-products from algae processing.
- Modify "Sewage sludge from urban wastewater treatments" to also include upstream source separated urine and faeces.
- Modify "Digestate or compost from separately collected biowaste" to simply "Separately collected biowaste": other treatments may be pertinent for valorisation of organic carbon and/or nutrient minerals in biowastes (e.g. pyrolysis).

We welcome that significant potential sources of P are already included in the proposed list of materials, in particular: urban sewage sludge and sewage sludge incineration ash, batteries, electronics wastes, catalysts, cables from buildings (e.g. P from flame retardants), PV panels, fuel cells …

ESPP will submit further details on definition of the material streams proposed above, and on potential quantities and quality of P, with references and back-up information, in coming weeks.

ESPP suggests to delete the wording "Slags, sludges, and ashes, in particular". We question that a material be included in the form of a sludge or slag, but excluded if it is dried to a powder (e.g. secondary heat available for drying to lower transport costs). Also, this wording could be considered to cover an undefined 'almost-anything which is semi-liquid'.

We suggest to modify the point "Bottom and fly ashes resulting from the mono-incineration of sludges from the treatment of urban wastewater" by deleting "mono". Current technologies can recover P from sewage sludge co-incinerated with animal by-products or certain other P-rich wastes, and future technologies may recover P from other co-incineration ashes.

For "municipal solid waste incineration" and "commercial or industrial waste incineration" we suggest to simply write "ashes" not "bottom ashes". Fly ashes may also contain significant amounts of P (and other valuable elements) and in some cases the distinction between bottom and fly ashes is unclear. The term "bottom ash" is unnecessarily technology limiting.

In order to make this list of potential materials more useable by both MS and stakeholders, we suggest that COM publish a table indicating for each listed material which CRM(s) are targeted.

ESPP requests that this consultation be extended because it seems many stakeholders were not aware of it with the summer season.

European Commission

Law

Feedback from: ESPP European Sustainable Phosphorus Platform

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^ Feedback from:

Feedback reference	F3582957
Submitted on	25 July 2025
Submitted by	Christopher THORNTON
User type	Non-governmental organisation (NGO)
Organisation	ESPP European Sustainable Phosphorus Platform
Organisation size	Micro (1 to 9 employees)
Transparency register number	260483415852-40 *(http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist id=260483415852-40&locale=en)*
Country of origin	Belgium
Initiative	Critical raw materials – products, components and waste streams with a high potential to recover critical raw materials *(https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14677-Critical-raw-materials-products-components-and-waste-streams-with-a-high-potential-to-recover-critical-raw-materials_en)*

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used in mineral fertilisers. - Agricultural run-off water, e.g. in tile or ditch drainage of fields. Agricultural drainage water contains significant quantities of P and P-trap systems have strong interest for eutrophication prevention and potentially enable P recovery or reuse. - Food industry, dairy processing, slaughterhouse wastes wastewaters - sludges and by-products, specifically including Cat1 Animal By-Product incineration ash. - Spent ABC fire extinguisher powders (significant tonnages of ammonium phosphates). - Metal processing liquors and spent phosphoric acids. - Dredging muds and sediments. - Waste or by-product streams from processing of bio-fuels, bio-materials, biorefineries, etc. - Algae and biomass grown in wastewater treatment systems or harvested (e.g. beach cleaning, biomass removal from canals) and wastes or by-products from algae processing. - Modify Sewage sludge from urban wastewater treatments to also include upstream source separated urine and faeces. - Modify Digestate or compost from separately collected biowaste to simply Separately collected biowaste: other treatments may be pertinent for valorisation of organic carbon and/or nutrient minerals in biowastes (e.g. pyrolysis). We welcome that significant potential sources of P are already included in the proposed list of materials, in particular: urban sewage sludge and sewage sludge incineration ash, batteries, electronics wastes, catalysts, cables from buildings (e.g. P from flame retardants), PV panels, fuel cells ESPP will submit further details on definition of the material streams proposed above, and on potential quantities and quality of P, with references and back-up information, in coming weeks. ESPP suggests to delete the wording Slags, sludges, and ashes, in particular. We question that a material be included in the form of a sludge or slag, but excluded if it is dried to a powder (e.g. secondary heat available for drying to lower transport costs). Also, this wording could be considered to cover an undefined almost-anything which is semi-liquid. We suggest to modify the point Bottom and fly ashes resulting from the mono-incineration of sludges from the treatment of urban wastewater by deleting mono. Current technologies can recover P from sewage sludge co-incinerated with animal by-products or certain other P-rich wastes, and future technologies may recover P from other co-incineration ashes. For municipal solid waste incineration and commercial or industrial waste incineration we suggest to simply write ashes not bottom ashes. Fly ashes may also contain significant amounts of P (and other valuable elements) and in some cases the distinction between bottom and fly ashes is unclear. The term bottom ash is unnecessarily

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