



Bruxelles, 18 June 2026

To:

DG GROW, Fertilisers, Theodora Nikolakopoulou,

[Theodora.NIKOLAKOPOULOU@ec.europa.eu](mailto:Theodora.NIKOLAKOPOULOU@ec.europa.eu)

DG SANTE, Animal By-Products, Laszlo Kuster [Laszlo.KUSTER@ec.europa.eu](mailto:Laszlo.KUSTER@ec.europa.eu)

Dear Ms Nikolakopoulou and Mr Kuster,

Our Platform (ESPP) is currently working with different aquaculture stakeholders (national governments/agencies, aquaculture farmers organisations, recycling industry, R&D) to progress recycling of “fish sludge” to fertiliser.

Fish sludge is the waste from aquaculture containing fish faeces, uneaten food, possibly fish scales, dead fish, tree leaves blown into the water .... Fish sludge is rich in nutrients and organic carbon. But also potentially in veterinary pharmaceuticals used for fish, fish pathogens, some heavy metals which are used in fish feed or to prevent disease.

Quantities of phosphate (an EU Critical Raw Material) in fish sludge in Norway alone are equivalent to that in sewage from around 20 million people, as well as nitrogen and organic matter. The current fertiliser supply and price crises impacting European farmers following Russia’s war against Ukraine and the Hormoz blockage shows the need to collect and recycle fish sludge, rather than losing it to the sea, with risks of eutrophication and fish disease. Valorisation of aquaculture residues is cited in the EU Fertiliser Action Plan, 19<sup>th</sup> May 2026.

The regulatory status of fish sludge is somewhat unclear, in part because art. 3.20 of the ABP Regulation 1069/2009 defines “manure” as “any excrement and/or urine of farmed animals other than farmed fish” and because to date it is not specifically considered as a possible input material in Annex II of the EU Fertilising Products Regulation 2019/1009.

Mr Klemencik of DG SANTE indicated at the workshop we organised in Bergen in 2025 that fish sludge is ABP Cat. 2 (see [www.phosphorusplatform.eu/Scope158](http://www.phosphorusplatform.eu/Scope158) ). However, to improve clarity for operators, investors and national regulators, **we hope that you will be able to confirm (or otherwise) in writing that to by the European Commission’s legal analysis:**

- Aquaculture sludge, from fish or shellfish production, is ABP Cat2
- On condition of processing and other requirements as specified in both regulations, aquaculture sludge can therefore be input to EU Fertilising Product Regulation under
  - CMC13 ash-based materials, by 2023/1605 art. 3(a)
  - CMC5 digestates, by 2023/1605 art. 3(b)
  - CMC3 compost, by 2023/1605 art. 3(c)but NOT to CMC10 as “processed manure” (as specified in the FPR FAQ 8.41)



We very much hope that you will be able to clarify these points in writing and look forward to hearing from you as this would be very helpful.

Yours

Yours, Robert van Spingelen

ESPP President