



Bruxelles, 18 June 2026

To:

Frank Verdonck, Head of Unit BIOHAW, EFSA Frank.VERDONCK@efsa.europa.eu,

Ernesto Liebana, Team leader BIOHAZ in charge of ABP
Ernesto.LIEBANACRIADO@efsa.europa.eu

Object: clarifications concerning procedure for submission of a request for an EFSA Opinion on fish sludge.

Dear Mr Verdonck, dear Mr Liebana,

Our Platform (ESPP) is currently working with different aquaculture stakeholders (national governments/agencies, aquaculture farmers organisations, recycling industry, R&D) to possibly prepare a request to EFSA to evaluate the safety of 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, 19th May 2026.

A number of stakeholders therefore consider that it would be appropriate to have an EFSA Opinion on the safety of use of fish sludge in fertilising products as such (e.g. dried) or after composting*, anaerobic digestion*, sterilisation*, pyrolysis (biochar) or combustion* (in all cases under input material and processing conditions to be specified).

* = *probably as per standard conditions specified in 142/2011 or in the IED Directive.*

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.

In order to try to progress this dossier for nutrient circularity whilst optimising time and resources of EFSA and of Competent Authorities, please can you clarify:

- Is it correct that a request for an EFSA Opinion can be submitted by stakeholders (associations or companies, one or more) but that this opinion: must be submitted via a Member State Competent Authority (a State where the process will be applied) and must include required information (142/2011 Annex 7) ?
- Does Norway ‘count’ as a Member State for this procedure ?
- Does the status of fish sludge as an ABP or not (or unclear) impact this possibility to request an Opinion ?



- Is it possible to submit one dossier for the different processes suggested above (same input material, same and-use) or should it be a number of separate dossiers ?

We look forward to hearing from you or to talking to your services if this might be a preferable way to proceed.

Yours, Robert van Spingelen

ESPP President