

N°	MEPs	Proposed ESPP position	Amendment content	ESPP comments
<b>Recitals</b>				
91	Aurélia Beigneux	Support	Recital 9: Fix calendar for extending tertiary treatment to allow time to implement	OK
150	Erik Poulsen, Asger Christensen	<b>Strongly support</b>	Recital 16: include nitrous oxide and methane in wwtp GHG assessments	Understanding nitrous oxide emissions is important to identify N recovery opportunities. Nitrous oxide can be a significant GHG emission from wwtps.
193	Hildegard Bentele	<b>Strongly support</b>	Recital 28: Widen nutrient recovery to not only sludge but also from wastewater. Ensure open to new recovery technologies and routes.	Corresponds to ESPP's proposal. Wording is clear.
194	Stelios Kypouropoulos	<b>Strongly support</b>	Recital 28: add COM should promote legislative frameworks for market for recovered N and P.	See 1103
195	Tudor Ciuhodaru	<b>Support</b>	Recital 28: add work with researchers on nutrient recovery from sludge for use in agriculture	Modify wording to "from sludge and wastewater" and for "use in agriculture or other applications"
196	Esther de Lange	<b>Strongly support</b>	Recital 28: widen to recovered products from wastewater (not only from sludge). Facilitate market access and use of recovered P	
197 198 199	Alexandr Vondra Pietro Fiocchi Sirpa Pietikäinen	<b>Strongly support</b>	Recital 29: Include nitrous oxide and methane in wwtp GHG emission monitoring	As for 150
212	Aurélia Beigneux	<b>Strongly oppose</b>	Recital 35: <b>P and N recovery are DELETED</b>	See 1093, 1094
216	Jan Huitema, Nils Torvalds, Emma Wiesner, Ulrike Müller	Support	Recital 35: Adoption of P and N targets within one year. Widening of wording.	Adoption within one year maybe not realistic but support overall objective of fixing short deadline.
<b>Art. 2 - Definitions</b>				
234 235	Margrete Auken Alexandr Vondra	Support	Include Circular Economy / resource recovery in core UWWT Directive objectives	

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284 285	Danilo Oscar Lancini, Silvia Sardone, Matteo Adinolfi, Rosanna Conte, Gianna Gancia, Aurélie Beigneux, Gianantonio Da Re Pietro Fiocchi	<b>Strongly support</b>	Modifies “Tertiary treatment” to removal of P <u>or</u> N (currently written P <u>and</u> N). Adds reference to annex.	The modification to “ <u>or</u> ” (or to “ <u>and/or</u> ”) is important. Whether P or N or both need to be removed will depend on specific wwtp context. In many cases, receiving water is not sensitive to both nutrients and removing “the other” nutrient unnecessarily has significant negative consequences (energy and chemicals consumption, costs). Reference to annex in ‘Definitions’ may be inappropriate.
286	Deirdre Clune, Dolors Montserrat, Adam Jarubas, Marian-Jean Marinescu, Ljudmila Novak, Jessica Polfjärd, Massimiliano Salini, Radan Kanev, Colm Markey, Seán Kelly, Pernille Weiss	Support	As 284-285 but without the reference to the annex.	
293	Dan-Ştefan Motreanu, Marian-Jean Marinescu	Modify wording	Longer definition of “Sludge”	Precision on type of plant (wwtp, septic tank, etc) is useful but maybe not coherent with UWWTD definitions of “autonomous”. And may prove to be incomplete. Also defining “Sludge” as “... sludge” is not clear.

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294 295	Danilo Oscar Lancini, Silvia Sardone, Matteo Adinolfi, Rosanna Conte, Gianna Gancia, Aurélia Beigneux, Gianantonio Da Re	<b>Oppose</b> (technical reasons)	Define “Sludge” as “mainly made of organic material”	Although sludge is usually mainly organic, this may NOT be true in some specific cases, for example tertiary chemical P-removal sludge (if not mixed back with other sludges) is mainly composed of inorganic iron phosphate salts with some co-settled or co-filtered organic particles. The definition should cover all sludges, so we suggest that this additional text should not be included (or possible add “ <i>in most cases</i> mainly made of organic material”)
296 297	Marek Paweł Balt, Mohammed Chahim, Sara Cerdas Dan-Ștefan Motreanu, Marian-Jean Marinescu	Support	Defines “Treated sludge” as stabilised, hygienised	Useful definition
298 299	Danilo Oscar Lancini, Silvia Sardone, Matteo Adinolfi, Rosanna Conte, Gianna Gancia, Aurélia Beigneux, Gianantonio Da Re Pietro Fiocchi	<b>Oppose</b> (technical reasons)	Defines “Treated sludge” as having undergone treatment to enable recycling / recovery	ESPP supports that sludge undergoes recycling/recovery, but sludge treatment generally has other objectives (stabilisation, hygienisation, energy recovery) so we suggest that this definition would be confusing and would leave many existing “treatments” in a legal void of undefined.
352 353 354 355 356	Marek Paweł Balt, Mohammed Chahim, Günther Sidl, Sara Cerdas, Tiemo Wölken, Heléne Fritzon Margrete Auken Pietro Fiocchi Alexandr Vondra Pernille Weiss	<b>Strongly support</b>	Include nitrous oxide and methane in definition of wwtp GHG emissions	As for 150

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<b>Art. 7</b>				
18	Nils Torvalds (Rapporteur ENVI)	Support / Unfavourable	Specify if Sensitive Areas are sensitive to P or to N	Some Sensitive Areas may be sensitive to both P and N: modify to “ <i>and/or</i> ” (P and/or N)
20 21	Nils Torvalds (Rapporteur ENVI)	Support / Unfavourable	Tighter P removal constraint but looser N removal constraint	Support tighter P constraint. Oppose looser N constraint.
480 489	Ulrike Müller	Neutral	Extends deadline for implementation of tertiary treatment from 2030/2035/2040 to 2035/2040/2045	Although it is important to maintain pressure to reduce nutrient losses and improve water quality, time is needed to validate and implement optimal solutions amenable to resource recovery.
494	Marek Paweł Balt, Mohammed Chahim, Sara Cerdas	Not necessary ?	Adds wording eutrophication “including from P and/or N”	Unnecessary? This is always true for eutrophication?
495	Margrete Auken	No opinion	MS to publish list eutrophication sensitive areas.	Unnecessary (already the case under Aarhus) but support the principle of transparency.
511 519	Ulrike Müller	Unfavourable	Extends deadline for tertiary treatment	Same as 480, 489
537	Nikolaj Villumsen, Anja Hazekamp	Unfavourable	Deletes possible % P/N removal exception	This exception could enable catchment wide nutrient reduction with nutrient trading schemes (catchment permitting)
540 541	Giuseppe Ferrandino Pietro Fiocchi	Oppose	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions, unless this enables nutrient recovery.
542 543	Marek Paweł Balt, Günther Sidl, Sara Cerdas, Heléne Fritzon Günther Sidl	Support if modified	Tighter P reduction constraint Looser N reduction constraint Operating temperature exemption <12°C	ESPP supports nutrient loss reductions Wording should be clarified to state that the 80% reduction applies above 12°C and that 70% reduction applies below 12°C

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544	Deirdre Clune, Dolors Montserrat, Adam Jarubas, Marian-Jean Marinescu, Ljudmila Novak, Jessica Polfjärd, Massimiliano Salini, Radan Kanev, Colm Markey, Seán Kelly, Christophe Hansen, Stelios Kypouropoulos	Unfavourable	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions
545	Alexander Bernhuber	Unfavourable	Looser N reduction constraint	ESPP supports nutrient loss reductions
546	Jessica Polfjärd	Unfavourable	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions
547	Traian Băsescu	Unfavourable	Looser N discharge constraint Operating temperature exemption <12°C	As above
548	Sirpa Pietikäinen	Support	Tighter P reduction constraint	ESPP supports nutrient loss reductions
549	Günther Sidl	Unfavourable	Looser N reduction constraint and operating temperature proviso	See 542, 543 Wording that N losses “are not relevant” on cold days should be removed: part of the N losses on these days will accumulate in the receiving waters and contribute to eutrophication problems when temperatures rise
550	Marek Paweł Balt, Günther Sidl, Sara Cerdas, Heléne Fritzon	Support if modified	Tighter P reduction constraint Looser N reduction constraint Operating temperature exemption <12°C	See 542, 543
551	Giuseppe Ferrandino	Unfavourable	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions
552	Sirpa Pietikäinen	Support	Tighter P reduction constraint	ESPP supports nutrient loss reductions

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553	Deirdre Clune, Dolors Montserrat, Adam Jarubas, Marian-Jean Marinescu, Ljudmila Novak, Jessica Polfjärd, Massimiliano Salini, Radan Kanev, Colm Markey, Seán Kelly, Christophe Hansen, Stelios Kypouropoulos	Unfavourable	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions
554	Traian Băsescu	Unfavourable / modify	Looser N discharge constraint Operating temperature exemption <12°C	See 558
555	Alexander Bernhuber	Unfavourable	Looser N reduction constraint	ESPP supports nutrient loss reductions
556 557	Jessica Polfjärd Pietro Fiocchi	Unfavourable	Later deadline for tighter P, N discharge	ESPP is opposed to pushing back nutrient loss reductions
558	Marek Paweł Balt, Sara Cerdas, Heléne Fritzon	Unfavourable / modify	Nutrient discharge reduction only applicable when temperature > 12°C	Nutrient losses on cold days may accumulate in the receiving waters (slow rivers, lakes, enclosed coastal waters) and then contribute to eutrophication problems when temperatures rise. Propose to allow the cold weather exemption only if “no risk” is demonstrated for accumulation or of impact during warmer weather.
559 560 561 563	Giuseppe Ferrandino Deirdre Clune, Dolors Montserrat, Adam Jarubas, Marian-Jean Marinescu, Ljudmila Novak, Alexander Bernhuber, Jessica Polfjärd, Massimiliano Salini, Radan Kanev, Colm Markey, Seán Kelly, Pernille Weiss, Jessica Polfjärd, Pietro Fiocchi	Unfavourable	Adds “relevant” to definition of discharge into Sensitive Areas.	Liable to lead to ambiguity or misinterpretation by Member States or by local water body managers – could possibly be used to avoid treating wastewater. Add that it must be demonstrated that the discharge will not impact the eutrophication Sensitive Area.

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<b>Art. 15</b>				
962	Javi López, César Luena, Nicolás González Casares, Estrella Durá Ferrandis, Marcos Ros Sempere	Support	Enable nutrient recycling in case of discharge water use in irrigation	OK
<b>Art. 11</b>				
833 834 837 840	Margrete Auken Pernille Weiss Erik Poulsen, Asger Christensen Marek Paweł Balt, Mohammed Chahim, Günther Sidl, Sara Cerdas, Tiemo Wölken, Heléne Fritzon	<b>Strongly support</b>	Require reduction of nitrous oxide emissions in energy audits of wwtps	As for 150
917	Pernille Weiss	<b>Strongly support</b>	Not increase nitrous oxide or methane emissions	As for 150
<b>Art. 20</b>				
1082 1083	Nikolaj Villumsen, Anja Hazekamp Esther de Lange	<b>Strongly support</b>	Change article title from “Sludge” to “Resource recovery”	Proposed amended wording is preferable: enables to cover nutrient recovery from the wastewater treatment process not only downstream in sludge, enables to cover e.g. water reuse

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1084	Hildegard Bentele	Unfavourable as worded.	<p>Wording would limit use of sewage biosolids in agriculture by obliging P and N recovery as “high quality product” used as an EU or national fertiliser or “in another field of application”.</p> <p>This would exclude agriculture use under waste legislation, that is with monitoring and traceability whereas this may be a good solution for LCA (environment and climate impacts) and farmer value, especially for smaller sewage works or where there is significant local agricultural demand for nutrients and carbon in sewage biosolids.</p>	<p>Technical recovery of nutrients is often not feasible in smaller sewage works and may not be LCA justified if sewage biosolids are used appropriately and safely locally.</p> <p>ESPP eNews n°29 (2018) summarising conclusions of ESPP General Assembly: <i>“ESPP should not promote a particular route or technologies for sewage biosolids management and phosphorus recycling, but should promote the advantages of different approaches appropriate to different regional contexts, subject in all cases to quality control, transparency and to effective nutrient recycling.”</i></p> <p>Also, we suggest that the wording “high quality products” is unclear and open to different interpretations. How will “high quality products” be defined? This wording may not be appropriate to include in the Directive requirements.</p>
1085	Sirpa Pietikäinen	Unfavourable as worded.	Excludes biosolids application to agricultural land	See discussion of 1084
1086	Marek Paweł Balt, Mohammed Chahim, Günther Sidl, Sara Cerdas, Heléne Fritzon	Unfavourable as worded.	Same as 1084	See 1084
1087	Alexandr Vondra	Support & modify	Deletes reference to “waste hierarchy” and specifies that both agricultural biosolids use and technical recovery are OK (for P only, does not mention N)	Not clear what this wording changes in practice. Should be modified to include possibility to recycle nitrogen (not only phosphorus) to quality products/materials.



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1088	Pietro Fiocchi	Oppose	Specifies that sludge “valorization in agriculture” is accepted	The statement as written is problematic because no quality or safety criteria are specified for agricultural biosolids use. Should be modified to specify that agricultural valorisation should be conform to environmental and health safety requirements and traceability (as at present) and that nutrient application should be only per crop needs
1089	Margrete Auken	Unfavourable as worded	Agricultural biosolids use must have “no” impacts	Not workable: zero emissions does not exist.
1090	Marek Paweł Balt, Mohammed Chahim, Günther Sidl, Sara Cerdas, Tiemo Wölken	Unfavourable	Add new point: MS must fix sludge limits of “micro-plastics, heavy metals, etc”.	Such limits should be preferably be defined in the revision of the EU Sludge Directive, rather than by each Member State.
1091	Dan-Ștefan Motreanu	Support	Add new point: MS to strive for nutrient circularity, sludge metal recovery, with biogas and biochar	ESPP supports the overall objectives but text is too vague, unclear what metals in sewage are feasible to recover, does not usefully add to existing COM proposed text.
1092	Dan-Ștefan Motreanu	Support	Adds that MS should consider resource recovery from sludge to contribute to strategic autonomy of EU fertiliser industry	Not clear that this brings any additional effect but support in principle.
1093	Aurélia Beigneux	<b>Strongly oppose</b>	<b>P and N recovery are DELETED</b>	French National Front
1094	Aurélia Beigneux João Pimenta Lopes	<b>Strongly oppose</b>	<b>P and N recovery are DELETED</b>	Portugal Communist (GUE/NGL) ... so as often the extreme right and left share the same anti-environment positions.
1095	Nikolaj Villumsen, Anja Hazekamp	<b>Strongly support</b>	Specifies P and N recovery from ww not only from sludge. Enables updates of recovery requirements. COM proposals to include facilitating market access for recovered nutrients.	<b>Widening to ww is ESPP proposal. Market access wording is good (clearer than 1102)</b>

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1096	Jan Huitema, Nils Torvalds, Emma Wiesner, Ulrike Müller	<b>Strongly support</b>	Widens N and P recovery to wwtp and not only from sludge. Fixes deadline date.	<b>As proposed by ESPP</b>
1097	Marek Paweł Balt, Günther Sidl, Sara Cerdas, Heléne Fritzon	Support but modify	Fixes P-recovery rate of 80% when incineration is in place. However, the wording is unclear whether this is 80% of P in ash, in sludge or input to wwtp.	80% is coherent with German legislation if it is % recovery from the ash (not from sewage works input). Modify wording to clarify to “ <i>minimum recovery rate from the ash for phosphorus ...</i> ”
1098	Sirpa Pietikäinen	Support	P and N recovery rates to be set at highest rate achieved in Member States.	Not clear how these “achieved” rates should be measured ... but such as text would have the advantage of obliging monitoring of recovery rates.
1099	Hildegard Bentele	Support	Minimum P-recovery rate should be defined from sludge ash	
1100	Margrete Auken	Support	Sludge management rules ensuring health and environmental safety	Implicitly supposes continuing appropriate use of sludge biosolids in agriculture.
1101	Alexandr Vondra	<b>Strongly support</b>	Clarify N and P recovery from sludge but also from wastewater	<b>As proposed by ESPP</b>
1102	Hildegard Bentele	Oppose or modify	Specifies minimum recovery rates of 50% for both N and P Also allows MS to set “additional rules” to facilitate market access for recovered N and P.	Notes: 50% recovery is probably low for P but 50% N recovery could be not feasible in some wwtp configurations. ESPP suggests that the recovery rate %s should be defined in the COM Delegated Act, after appropriate stakeholder and scientific consultation including of Council and Parliament, and taking into account technological progress. The possible market measures are not clear: why MS ? not as clear as 1095.
1103	Stelios Kypouropoulos	<b>Strongly support</b>	COM to promote “enabling legislative framework” for market for recovered N and P	See 194
1104	Jan Huitema, Nils Torvalds, Emma Wiesner, Ulrike Müller	<b>Strongly support</b>	COM to take measures to encourage purchase of recovered nutrients	

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<b>Art. 22</b>				
1151	Alexandr Vondra	<b>Strongly support</b>	Include nitrous oxide in data base of wwtp GHG emissions	As for 150
<b>Annexes</b>				
44	Nils Torvalds (Rapporteur ENVI)	Support	Include “Natural N retention” in calculation of N removal	Support because technically it is not feasible to separate what is “natural” retention and what is not “natural”, in that reduction is generally measured by “input” minus “output”
1311	Nikolaj Villumsen, Anja Hazekamp	Unfavourable	Annex II: Deletes possibility to not implement P and N removal for large agglomerations discharging into certain coastal water (i.e. amendment proposes that nutrient removal is obligatory even if demonstrated that it “will have no effect on the level of eutrophication”).	For coastal waters (where nutrients will not accumulate), nutrient removal is demonstrated to have no effect on limiting eutrophication in coastal waters, then it should not be required. Demonstrating “no effect” is a strong safeguard. Unnecessary nutrient removal implies environmental impacts and costs.
1397	Ulrike Müller	Unfavourable	Annex I: increases P discharge limit for wwtps < 10 - 100 000 p.e. from 0.5 to 1 mgP/l	Stringent P discharge limits are feasible and should be implemented in wwtps of this size. A limit of 0.25 mgP/l is technically feasible, so 0.5 mgP/l is certainly feasible and should not be loosened.