

Draft joint call for nutrients in the EU Circular Economy Act

The signatory organisations below call for an EU Circular Economy Act which is ambitious for nutrients, to forward sustainability, EU job creation and competitiveness, and food system resilience. They ask that the principles below be included into the future EU Circular Economy Act.

Certain signatory organisations are developing their own specific proposals, available via the contacts or websites indicated. Detailed proposals prepared by ESPP, after wide stakeholder consultation (including workshops in 2024 and 2025), on policies for market-pull for recycled nutrients, on nutrient recycling in the Circular Economy Act and on implementing the EU Urban Waste Water Directive phosphorus ‘reuse and recycling rates” are here: www.phosphorusplatform.eu/regulatory

- ✓ Integrate a primary objective of **reducing resource consumption** into waste policy.
- ✓ Add a **target of reducing EU virgin nutrient consumption** to the Green Deal / [UN Biodiversity Convention](#) target of reducing nutrient losses by -50%.
- ✓ Develop **coherent policies to reduce resource consumption, prevent waste and develop circularity**, including regulatory targets, market tools, fiscal and economic, public purchasing, border and trade ...
- ✓ **Improve EU coordination and implementation of Circular Economy policies**: e.g. EU Circular Economy Board, information point, FAQ ... Ensure coherence of all relevant EU regulations to support circularity, including where possible coherence of authorisations for different applications. Ensure coherence and clarify definitions between regulations and with waste codes.
- ✓ **Address regulatory obstacles to recycling, whilst maintaining cradle-to-grave producer responsibility and traceability**, in particular:
 - Simplify – accelerate – make coherent **EU and National End-of-Waste** procedures and their communication and implementation,
 - Create facilitated legal status and procedures for ‘**secondary raw materials**’ intended for recycling,
 - Address **permitting** obstacles to intake of secondary raw materials into production sites,
 - Facilitate administration of wastes **for R&D and testing** of recycling processes and routes.
- ✓ Develop **general ‘End-Points’ for processes recognised as safe**, for which authorisations should be based primarily on **quality** of the recycled product (product testing, process quality assurance ...), not on origin of input materials, but with traceability of the input material.
- ✓ Develop policies to ensure market demand (‘pull’) for recycled nutrients (see ESPP proposals [here](#)), including to **evaluate the feasibility of a recycled content target or quota and recycled content trading scheme** for recycled phosphorus in fertilising products (inorganic and organic).
- ✓ Modernise the **Animal By-Products and Animal Feed regulations** to improve coherence and user understanding, facilitate and remove unjustified obstacles to circularity, whilst maintaining guarantees of safety and food-chain confidence.
- ✓ **Support farmers** for nutrient recycling and for use of recycled fertilisers through the CAP (see discussion in [SCOPE Newsletter n°154](#)).
- ✓ **Nutrients as Strategic and Critical Raw Materials**. Define ‘Strategic’ inputs for agriculture, critical for food security and food sovereignty, parallel to the CRM Act ‘Strategic Materials’ for industry. Implement CRM Act art. 26 for phosphorus.
- ✓ Implement **separate collection of household organic wastes** (biowaste) with nutrient recycling.
- ✓ Integrate nutrient recycling into the **EU Renewable Energy Directive** (RED II), in particular manure digestate processing.
- ✓ EU guidance and coordination of waste / ABP / regulatory status of **waste-fed algae and biomass** and extracts therefrom.
- ✓ **Pollution at source**: rapidly phase out or strongly restrict industrial chemicals susceptible to be an obstacle to nutrient and organics recycling, including in imported products:
 - In particular, rapidly ban PFAS for consumer applications and non-essential industrial applications,
 - Ensure robust enforcement procedures and verification for imports, including chemicals included in imported ‘articles’.
- ✓ Clarify integration of nutrient circularity, resource consumption reduction and phosphorus as a CRM across EU policies, including: **Organic Farming, Taxonomy, Corporate Sustainability Reporting, Public Purchasing, Fiscal policies, Battery Recycling Directive, EU chemicals regulation REACH, Industrial Emissions Directive** ...
- ✓ **Improve data** to support policies, in particular for organic-based fertilising products.

List of signatory organisations: name of organisation, logo, contact email and/or website