



To JRC – IPTS c/o Rocio Rodriguez Quintero

26th November 2013

Object: EU Ecolabel criteria revision Soil improvers and Growing media

Phosphorus is an essential, non-substitutable, non-renewable resource for which Europe is largely dependent on imports*.

A key aspect of phosphorus sustainability, alongside reducing use and improving efficiency, is the recycling of phosphorus from waste streams including manures, sewage, food wastes, food industry and other industrial processes.

The “Soil improvers and Growing Media Ecolabel” should take flagship positions in favour of such recycling, whilst guaranteeing a high level of safety and consumer confidence regarding contaminants.

Biosolids recycling

The most important route for phosphorus reuse and recycling in Europe today is agricultural application of appropriately treated biosolids (manures, sewage sludges, other sludges). We note that the current proposed criteria accept such biosolids as ingredients in Ecolabeled products, subject to appropriate quality/contaminant limits, and subject to achieving the (future) EU End-of-Waste criteria for composts and digestates (that is, biosolids which have not been composted or digested are excluded).

We note, additionally, that the proposed Ecolabel criteria specifically EXCLUDE sewage sludges (as do the current EU End-of-Waste draft criteria). This exclusion ‘on principle’ of sewage sludges is supported by some stakeholders, because of concerns about pathogens or contaminants. However, it is also contradictory to the objectives of making waste waters into a resource, and of optimising the recycling of phosphorus, nitrogen and organic carbon in waste waters. Agricultural reuse routes need to be maintained for appropriately treated sewage biosolids (stabilised, sanitised), subject to ensuring levels of organic contaminants (pharmaceuticals, hormones) which do not pose risks.

Regarding manures, we understand that these are authorised in the Ecolabel criteria, subject to composting or digestion to achieve End-of-Waste status, but perhaps this should be explicitly stated. Also, we are unclear as to the status of manures following other forms of treatment (e.g. drying and pelletising, subject to achieving the Ecolabel criteria for stability).

We also agree with EEB – BEUC’s proposal to authorise the appropriate inclusion of biochars.

As a general comment, we note that sludges and digestates are proposed to be only admitted (as ingredients to Ecolabel soil improvers or composts) if they pass End-of-Waste criteria, but it is not clear if this refers only to European E-o-W criteria (currently being developed) or to any Member State’s national E-o-W criteria. If the latter, then how is the coherence of the Ecolabel ensured across Europe ?

Phosphate recovery and recycling



We support the proposal by EEB and BEUC to specify in the criterion 1.3 that (at least for phosphorus), minerals used be either partly or completely sourced from recycled phosphates. A number of processes for recovery of mineral forms of phosphorus from sewage, manure and food industry waste streams are today demonstrated and are looking for implementation, including phosphate recovery from sewage liquors as struvite (magnesium ammonium phosphate), K-struvite (magnesium potassium phosphate) or as calcium phosphates, phosphate recovery by extraction of phosphates from sewage sludge incineration ash, or other processes. We also would suggest that MBA (Meat and Bone Ash), animal bone biochar (ABC), chicken litter incineration ash, or similar products, which are sanitised and safe, and which provide appropriate levels of plant-available phosphorus, should be authorised in place of mineral phosphates in the Ecolabel.

Specifying recovered phosphates in the Ecolabel would provide a positive incentive for implementation of such processes and would place the Ecolabel as a flagship for phosphorus recycling.

Such recovered phosphates should of course be subject to the same contaminant criteria as other ingredients and in view of the discussion on sewage sludge (see above) a maximum level of organic content of such phosphates recovered from sewage could be applied.

User information on nutrient content

Efficient phosphorus management requires full information of farmers and users. We regret that the Ecolabel does not require specification of the phosphorus content: this should be expressed as its fertiliser replacement value so that farmers and agronomists know how to use it optimally. We would suggest that for all products total phosphorus content (as a range to cover the variability of organic products) should be included as user information (as is the case in the draft EU End-of-Waste criteria), and above a certain level of total phosphorus it should be further specified the readily available phosphorus (citrate soluble or similar).

** The European Sustainable Phosphorus Platform was established following the first European conference on phosphorus stewardship in March 2013 bringing together the European Commissioner for the Environment, Member States, industry, NGOs and knowledge centres. The Platform's objectives are to promote more sustainable use and management of phosphorus in agriculture, the food chain and industry, including developing phosphorus reuse and recycling.*