

DRAFT ESPP input
to EU public consultation on the
Roadmap for a New Circular Economy Action Plan

<https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-7907872>

ESPP www.phosphorusplatform.eu welcomes the new Commission's commitment to accelerate the development of the Circular Economy, as a core aspect of EU industry and environment policies.

In addition to the industrial target sectors cited in the Roadmap, ESPP welcomes the continuing engagement towards "closing loops for biological materials".

Recycling of nutrients, organic carbon and other materials in biological sources, such as animal by-products, food waste, sewage sludge, manure and agriculture and forestry by-products offers important potential for reducing EU dependency on the Critical Raw Material phosphate rock, for returning organic carbon, nitrogen and other nutrients to soil, and for creating jobs and added value, especially in agriculture and rural communities. The new EU Fertilising Products Regulation is a significant step forward, but further actions are now needed, in particular on animal by-products, on circularity in agriculture (CAP) and to address at source pollutants contaminating biological material streams (PFAS, microplastics, pharmaceuticals ...).

ESPP therefore regrets that the proposed Roadmap does not identify links with the EU bioeconomy strategy, CAP, soil and water policies.

The Roadmap identifies the problem that secondary raw materials are currently often less price competitive, but regrets the absence of actions to address this. The decentralised, small scale structure of recovery and recycling and their employment-intensive nature are positive (job creation, rural communities), but have price impacts. Measures should be considered to balance this, such as legal recycling obligations, recycled content quotas in products and transfer of social contributions from employment to taxation of energy and resource consumption. We suggest that the Roadmap includes engaging discussions with Member States to define and implement such measures, either at the EU level or in concerted fiscal actions by Member States (EU Semester).