



ESPP input to EU consultation on “Sewage sludge use in farming – evaluation” (Roadmap)

25th August 2020

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12328-Evaluation-of-the-Sewage-Sludge-Directive-86-278-EEC->

ESPP (European Sustainable Phosphorus Platform) welcomes the evaluation of the Sewage Sludge Directive (SSD) and the priority indicated of “**contributing to resource efficiency (through the recovery of useful nutrients such as phosphorus)**” in the context of the Green Deal and the Circular Economy Action Plan.

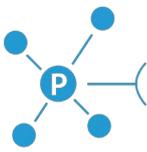
We welcome the emphasis that “*sludge be used in such a way that account is taken of the nutrient requirements*”. **Sewage sludge contains valuable crop nutrients, in particular phosphorus, but over- or mis-application of nutrients is not effective recycling.** The contribution of sludge use to soil carbon should also be considered.

ESPP welcomes the recognition of concerns about **emerging contaminants**, in particular “*organic chemicals such as pharmaceuticals, PAH and PFAS, cosmetics and microplastics*”. Although the SSD addresses sludge use, the evaluation should also consider reduction at source of such contaminants where possible: regulatory bans on problematic industrial or consumer chemicals such as perfluorinated chemicals PFOS/PFOA or non-biodegradable cosmetics ingredients, possible reduction actions or improvements in sewage treatment to reduce contaminants which cannot simply be prohibited (pharmaceuticals, microplastics from abrasion ...). The UK UKWIR CIP2 studies, for example, identified perfluorinated chemicals and fluoranthene, brominated flame retardants, cypermethrin and TBT as priority industrial contaminants (see <https://ukwir.org/the-national-chemicalinvestigations-programme-2015-2020-volume-3-wastewater-treatmenttechnology-trials>)

The “*Purpose and Scope*” should assess what policies, financial tools and technologies have been effective or offer potential to **reduce, at source or in sewage treatment, levels of emerging contaminants in sewage sludge.**

The evaluation of the SSD should consider three objectives (1) developing circularity of secondary resources in sewage sludge, and (2) optimising nutrient recycling whilst ensuring safety (3) improving economic feasibility of resource recovery and recycling.

ESPP suggests that stakeholder and public consultations proposed should be concomitant with those for the Urban Waste Water Treatment Directive, for which the inception impact assessment of the evaluation is also currently out for public comment.



In order to ensure regulatory coherence, the evaluation should assess whether revision of the SSD is pertinent or whether these objectives can be better achieved by:

- End-of-Waste policies, including progressive inclusion of sewage-derived materials into the new EU Fertilising Products Regulation for nutrient products, and further specific EU End-of-Waste product approaches for other sewage-derived materials. These policies should enable adaptation to new technologies, products and markets, in order to facilitate the Circular Economy.
- further integrating sewage sludge management into water policy, including defining both recycling objectives and safety criteria, in particular in the Water Framework Directive and the Urban Waste Water Treatment Directive. This should be coherent with the EU Chemicals Strategy for Sustainability (Toxic-free EU Environment).

The SSD evaluation should ensure coherence with the **Integrated Nutrient Management Action Plan (INMAP) proposed in the new EU Circular Economy Action Plan**.

The SSD is intrinsically linked to the Urban Waste Water Treatment Directive, for which the Inception Impact Assessment is submitted to public comment until 8th September 2020, and the two consultation and evaluation processes should input into one another.

Under “European Added Value”, it should be assessed whether the SSD is coherent with objectives or actions in Member States or regions towards recycling of nutrients in sewage (e.g. German phosphorus recovery ordonnance, Sweden phosphorus recycling policy, HELCOM sewage sludge handling Recommendation ...) and how the SSD can facilitate further such actions in other Member States.

We request that **the reference to the Ramboll et al 2019 study on digestate and compost be removed**. The conclusions of this study and the “Risk Reduction” measures proposed are not justified by the study content and a request has been made by ESPP supported by various stakeholders that the European Commission accompany the publication of the study with a statement to this effect, or that the Commission submit the study to SCHER (Scientific Committee on Health and Environmental Risks) requesting an Opinion on the validity of the study conclusions.