

15th October 2018

On behalf of the signatory organisations indicated below:

To: *Rapporteurs for the European Parliament and for Council, to Shadow Rapporteurs and Member States Permanent Representatives to Council*

To: *Elżbieta Bieńkowska,*

European Commissioner for Internal Market, Industry, Entrepreneurship and SMEs

To: *Jyrki Katainen,*

European Commissioner for Jobs, Growth, Investment and Competitiveness

Object: Conclusion of the EU Fertilising Products Regulation

Dear Rapporteurs, dear Ms Bieńkowska, dear Mr Katainen

The Circular Economy in Europe is a core element of the current European Commission's strategic objectives.

The proposed new EU Fertilising Products Regulation is a flagship initiative of the Commission's Circular Economy Package. It is an ambitious legislative proposal which will open a new approach to product legislation, important for the development of the Circular Economy because it addresses barriers for recycled materials.

This new Regulation is strongly awaited by industry and stakeholders to enable development of secondary fertilising products, to open the European market for recycling technologies and to stimulate investment in new processes. Furthermore, safety and quality will be clarified, and farmers will have better information and better choice of product, with co-existence of both EU-Label and national fertilisers.

Circularity in the fertilising products industries means employment, including many non-displaceable jobs in rural areas (where recyclable nutrient materials such as manure or crop by-products are produced), and reduced dependency on imports. Estimations suggest that recycling of all biowaste in Europe would generate 320 000 direct and indirect jobs. The mineral fertilisers industry already today employs nearly 100 000 people in Europe with more than half of its products using by-products as inputs. Phosphorus recycling alone could create some 60 000 new jobs. (Different sources)

However, we are increasingly concerned that this frontrunner legislative proposal of the current Commission's Circular Economy objectives may in fact not achieve adoption. The proposal is, it seems, "stuck" in trilogue. There appear to be both political blockages and also difficulties to finalise workable solutions on important technical issues. These technical questions include by-products, animal by-products, realistic conformity assessment requirements, respect of normal REACH requirements, chemical reactions between CMCs, amongst others, as well as wording clarifications. Progress is being made on some of these.

The coming months and the Austria presidency probably represent a critical window for finalisation of this flagship Regulation, before the approach of European Parliament elections. We know that DG GROW services have consistently engaged to support trilogue and appreciate that the resources of the Unit have now been reinforced to facilitate this.

For these reasons, we hope that, together, Council, Parliament and the European Commissioners concerned can take the political initiative necessary to finalise the trilogue on the Fertilising Products Regulation as a flagship for the Circular Economy.

We would be happy, to discuss any aspects of this Regulation further with you and your colleagues or services.

List of signatory organisations (as at 15th October 2018) follows

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FERTIKAL

EFAR



OSTARA

EBA
European Biogas Association



EKOBALANS

EFPRA
EUROFEMA

Culterra

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DANVA

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