



ESPP note for DG GROW, JRC, DG RTD, 21 June 2019

- DG GROW: chemicals (Fertilising Products Regulation), Critical Raw Materials
- JRC – CRM 3rd reassessment
- DG RTD (Eco-innovation Unit)

Object:

Monitoring success of Circular Economy (in particular, FPR) and Critical Raw Materials policies for phosphorus

Context:

Several EU policy actions aim to develop the nutrient Circular Economy, in particular phosphorus recycling, including the Fertilising Products Regulation, Critical Raw Materials, and research funding (Horizon Europe, but also Interreg, LIFE).

The only consistent data on phosphorus available on phosphorus recycling in Europe is in K. van Dijk et al. 2016ⁱ (data for 2005 – 2010). There is today no update or follow-up planned. This study identifies flows and provides a data set (for this date) and provides a starting point for discussion of and definition of indicators.

The Deloitte CRM List second assessment indicates a recycling rate for “phosphate rock” (EOL-RIR) of 0% or 17%. Both numbers are unjustified and meaningless.

A number of significant R&D projects have as objectives to contribute to developing phosphorus recycling across Europe (by addressing technology, markets, regulatory context ...) but these do not (to our knowledge) include establishment of EU or other-scale P-recycling indicators.

Thus, at present, there is no indicator (no agreed calculation method, no data update) to monitor success of the above EU Circular Economy policies for phosphorus.

JRC is currently preparing a ‘Criticality Reassessment’ of phosphorus rock, under mandate from DG GROW. ESPP is in dialogue with JRCⁱⁱ. To our understanding, given the time constraints, this reassessment for phosphate rock will use the same methodology as in the past.

ESPP proposal:

ESPP suggests that COM initiates for 2020 the following actions:

- Update knowledge of what data is today available, what studies and actions are underway (update DONUTSS 2015ⁱⁱⁱ)
- Engage with JRC, scientists (phosphorus flow experts, agronomists, ...) and stakeholders (phosphate and fertiliser industries, regulators, farmers organisations, food industry) to establish an agreed approach to defining recycling indicator(s) for phosphorus (equivalent to EOL-RIR and EOL-RR for ‘phosphate rock’)

The objective of this dialogue should be to provide the basis necessary for COM to define how to establish relevant indicators and data update / collection systems, possibly on the basis of technical feasibility and costing studies.

ESPP is interested and willing to provide whatever useful input we can, through our members and network of stakeholders.

ⁱ <http://dx.doi.org/10.1016/j.scitotenv.2015.08.048>

ⁱⁱ see summary of ESPP – JRC telcon 12 April 2019, attached

ⁱⁱⁱ DONUTSS workshop (3-4 September 2015), see conclusions online at www.phosphorusplatform.eu/DONTUSS