Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

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FEAD feedback to the EC Initiative on the evaluation of the Sewage Sludge Directive (SSD)

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe, welcomes the new roadmap initiative on the evaluation of the Sewage Sludge Directive (SDD).
FEAD is aware of the caution to be taken when talking about this topic due to the necessary attention for human health and environment.

Sludges are rich in nutrients such as nitrogen and phosphorous and contain valuable organic matter that is useful when soils are depleted or subject to erosion and can limit or avoid the use of chemical fertilizers.

Treated sludge as per Directive 86/278/EEC of 12 June 1986 are defined as "*sludges which have undergone biological, chemical or heat treatment, long-term storage or any other appropriate process so as significantly to reduce its fermentability and the health hazards resulting from its use is defined as having undergone*".

Sludges originate from the process of treatment of wastewater which should provide a characterization of the sludge in terms of heavy metals, pollutants and possible presence of pathogenic organisms.

We must therefore ensure that no health or environmental risks are taken.

In order to avoid sanitary/pathogenic issues, precautionary measures need to be put in place: for example, the distribution of sludge for the growth of fruits and vegetables must occur 10 months prior to harvesting, same limitation should be observed for 5 weeks prior to grazing. These measures (already implemented in some EU Countries), can grant the absence of issues rated to the distribution of sludge.

However, the revised directive should set a hierarchy of desired uses for sludge that encourages preferential use in soil restoration rather than food/feed producing land.

Strict limits should be envisaged as sludges in agriculture involves people's health: so, testing should include, besides excluding the presence of pathogens and heavy metals, radioelements (in cases sludges come from healthcare facilities), microplastics and POPs. These elements were not taken into consideration in the previous directive.

Nutrient assessment is also essential to be undertaken, in order to properly make use of sludges, so if they do not improve the quality of soil, energy recovery should be foreseen.
In conclusion, if the above-mentioned conditions of soil/health and groundwater protection are not met, Waste to Energy solution with phosphorous recovery should be the only way to dispose the sewage sludges.

FEAD AISBL – Rue Philippe Le Bon, 15 – B-1000 Brussels, Tel : +32 2 732 32 13, Email : info@fead.be, Website : www.fead.be
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