

Public Consultation - Evaluation of the Sewage Sludge Directive 86/278/EEC

Fields marked with * are mandatory.

1. Public Consultation Questionnaire

Introduction

The Sewage Sludge Directive 86/278/EEC (henceforth the SSD) was adopted to encourage the correct use of sewage sludge in agriculture and to regulate its use in order to prevent harmful effects on soil, vegetation, animals and humans. The principal benefit of the SSD is its role in the protection of human health and the environment against the harmful effects of contaminated sludge in agriculture. To this end, it prohibits the use of untreated sludge on agricultural land unless it is injected or incorporated into the soil. The Directive also requires that sludge be used in such a way that account is taken of the nutrient requirements of plants and that the quality of the soil and of surface and groundwater is not impaired.

The Directive complements EU waste legislation by encouraging the safe use of sludge (moving it up the waste hierarchy), by promoting health and environmental protection (by placing limits on heavy metals), and by contributing to resource efficiency (through the recovery of useful nutrients such as nitrogen and phosphorus).

The use of sludge in agriculture is an effective alternative for chemical fertilisers, as it is rich in nutrients such as nitrogen and phosphorous and contains valuable organic matter that is useful when soils are depleted or subject to erosion. The importance of recycling of materials, in line with circular economy principles, is highlighted as a priority area under the European Green Deal and the Circular Economy Action Plan (CEAP). Transformation of the industry and all the value chains is required for Europe to be less dependent on the extraction of raw materials.

Since sludge originates from the process of treatment of waste water, due to the physical-chemical processes involved in the treatment, it tends to concentrate heavy metals and poorly biodegradable trace organic compounds as well as potentially pathogenic organisms (viruses, bacteria etc) present in wastewaters. It is therefore important that what is used as a resource is not contaminated, otherwise recycling will result in increasing pollution of soil, water and/or air. This is also in line with the Commission's zero pollution ambition announced in the European Green Deal (a strategy is expected in 2021).

The New Circular Economy Action Plan adopted on 11 March 2020 commits the Commission to consider revising the SSD. Therefore, this evaluation aims to see whether the law is doing what it is meant to do, whether its objectives are still relevant today, and whether the costs arising from the requirements of the law are justified.

Finally we would like to invite you to participate as well in the parallel open public consultation on the Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment. It will be available for your feedback on this Have your Say portal in Q1 2021.

Guidance on the questionnaire

The purpose of this consultation is to understand the views of the public on sewage sludge and how it is managed. This public consultation consists of some introductory questions related to respondent profile, followed by a questionnaire divided into five parts:

Part 1: Introductory questions

Part 2: Your understanding of sewage sludge and legislation on sewage sludge

Part 3: Your understanding of costs and benefits associated with the SSD

Part 4: The value of the SSD

Part 5: Specialised questions

Part 6: Final questions

Some sections are addressed to all respondents, while others such as Part 5, are only addressed to those with a high level of knowledge in the topic area.

Please note that not all questions in the questionnaire need to be answered. All questions include an “I do not know/not relevant” that you can use when you do not know the answer or do not have an opinion.

At the end of the questionnaire, you are invited to provide any additional comments or elaborate on relevant issues that have not been addressed by the questions, as well as, to provide any general feedback that you may have on the survey itself.

You are invited to respond to the best of your abilities or knowledge of the topic. Please use open fields only if there is information to be added that is strictly relevant to the related question. You are also invited to upload concise documents in the final question.

The results of the questionnaire will be published online. All of the responses to this consultation will be fully assessed and the overall results will be included in the analysis supporting the evaluation of the Sewage Sludge Directive. We will also produce a stand-alone summary of the results of the consultation (to be published here). Please read the specific privacy statement on the homepage of this consultation informing on how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your organisation’s contribution will be treated and published together with those received from

individuals.

If you have any questions, please contact the European Commission via ENV-B3-ARES@ec.europa.eu

Your voice matters and we are grateful to you for taking the time to complete this consultation.

2. Questionnaire

Part I: Introductory Questions

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian

- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

If you represent an industrial/economic actor (associations or companies), which of the following operations is more relevant to you?

- Waste water treatment plants
- Sewage sludge processing
- Associations of producers or managers of sewage sludge
- Farmers
- Compost and digestate industry
- Fertiliser and fertilising products industry
- Food industry
- Waste management
- Research and Education
- Other, please specify:

Please indicate your:

* First name

FEAD

* Surname

Secretariat

* Email (this won't be published)

info@fead.be

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|--|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |

- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago

- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen

- Czechia
- Lebanon
- Saint Helena
Ascension and
Tristan da
Cunha
- Zambia
- Democratic
Republic of the
Congo
- Lesotho
- Saint Kitts and
Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Please indicate the location of your organisation:

Non-EU Member State:

- AF - Afghanistan
- AL - Albania
- DZ - Algeria
- AD - Andorra
- AO - Angola
- AG - Antigua and Barbuda
- AR - Argentina
- AM - Armenia
- AU - Australia
- AZ - Azerbaijan
- BS - Bahamas
- BH - Bahrain
- BD - Bangladesh
- BB - Barbados
- BY - Belarus
- BZ - Belize
- BJ - Benin
- BT - Bhutan

- Ⓒ BO - Bolivia
- Ⓒ BA - Bosnia and Herzegovina
- Ⓒ BW - Botswana
- Ⓒ BR - Brazil
- Ⓒ BN - Brunei Darussalam
- Ⓒ BF - Burkina Faso
- Ⓒ BI - Burundi
- Ⓒ CV - Cabo Verde
- Ⓒ KH - Cambodia
- Ⓒ CM - Cameroon
- Ⓒ CA - Canada
- Ⓒ CF - Central African Republic
- Ⓒ TD - Chad
- Ⓒ CL - Chile
- Ⓒ CN - China
- Ⓒ CO - Colombia
- Ⓒ KM - Comoros
- Ⓒ CG - Congo
- Ⓒ CR - Costa Rica
- Ⓒ CU - Cuba
- Ⓒ CI - Côte D'Ivoire
- Ⓒ CD - Democratic Republic of the Congo
- Ⓒ DJ - Djibouti
- Ⓒ DM - Dominica
- Ⓒ DO - Dominican Republic
- Ⓒ EC - Ecuador
- Ⓒ EG - Egypt
- Ⓒ SV - El Salvador
- Ⓒ GQ - Equatorial Guinea
- Ⓒ ER - Eritrea
- Ⓒ SZ - Eswatini
- Ⓒ ET - Ethiopia
- Ⓒ FJ - Fiji
- Ⓒ GA - Gabon

- GM - Gambia
- GE - Georgia
- GH - Ghana
- GD - Grenada
- GT - Guatemala
- GN - Guinea
- GW - Guinea Bissau
- GY - Guyana
- HT - Haiti
- HN - Honduras
- IS - Iceland
- IN - India
- ID - Indonesia
- IR - Iran
- IQ - Iraq
- IL - Israel
- JM - Jamaica
- JP - Japan
- JO - Jordan
- KZ - Kazakhstan
- KE - Kenya
- KI - Kiribati
- KW - Kuwait
- KG - Kyrgyzstan
- LA - Laos
- LB - Lebanon
- LS - Lesotho
- LR - Liberia
- LY - Libya
- LI - Liechtenstein
- MG - Madagascar
- MW - Malawi
- MY - Malaysia
- MV - Maldives

- ML - Mali
- MH - Marshall Islands
- MR - Mauritania
- MU - Mauritius
- MX - Mexico
- FM - Micronesia
- MC - Monaco
- MN - Mongolia
- ME - Montenegro
- MA - Morocco
- MZ - Mozambique
- MM - Myanmar
- NA - Namibia
- NR - Nauru
- NP - Nepal
- NZ - New Zealand
- NI - Nicaragua
- NE - Niger
- NG - Nigeria
- KP - North Korea
- MK - North Macedonia
- NO - Norway
- OM - Oman
- PK - Pakistan
- PW - Palau
- PA - Panama
- PG - Papua New Guinea
- PY - Paraguay
- PE - Peru
- PH - Philippines
- QA - Qatar
- MD - Republic of Moldova
- RU - Russian Federation
- RW - Rwanda

- KN - Saint Kitts and Nevis
- LC - Saint Lucia
- VC - Saint Vincent and the Grenadines
- WS - Samoa
- SM - San Marino
- ST - Sao Tome and Principe
- SA - Saudi Arabia
- SN - Senegal
- RS - Serbia
- SC - Seychelles
- SL - Sierra Leone
- SG - Singapore
- SB - Solomon Islands
- SO - Somalia
- ZA - South Africa
- KR - South Korea
- SS - South Sudan
- LK - Sri Lanka
- SD - Sudan
- SR - Suriname
- CH - Switzerland
- SY - Syrian Arab Republic
- TJ - Tajikistan
- TZ - Tanzania
- TH - Thailand
- TL - Timor-Leste
- TG - Togo
- TO - Tonga
- TT - Trinidad and Tobago
- TN - Tunisia
- TR - Turkey
- TM - Turkmenistan
- TV - Tuvalu
- UG - Uganda

- UA - Ukraine
- AE - United Arab Emirates
- GB - United Kingdom
- US - United States of America
- UY - Uruguay
- UZ - Uzbekistan
- VU - Vanuatu
- VE - Venezuela
- VN - Viet Nam
- YE - Yemen
- ZM - Zambia
- ZW - Zimbabwe

EU Member State:

- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY- Cyprus
- CZ - Czech Republic
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- PL - Poland

- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden

If other, please specify:

200 character(s) maximum

* Organisation name

255 character(s) maximum

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

Is your organisation involved or directly affected in the recovery, treatment or use of sludge and/or waste waters?

- Yes
- No

How do you rate your level of knowledge of the following? (please choose one of the following options)

	Excellent knowledge /understanding	Good knowledge /understanding	Some knowledge /understanding	Little knowledge /understanding	None
The Sewage Sludge Directive (SSD) - legal text	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The implementation of the SSD - practical implementation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Treatment of sewage sludge - technical knowledge	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*** Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Part 2: Your understanding of sewage sludge and legislation on sewage sludge

1) In your country of residence, to what extent do you think that sewage sludge (i.e. residual sludge from sewage plants treating domestic/urban waste waters, and from other sewage plants treating waste waters of a composition similar to domestic and urban waste waters) is ...?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know / no opinion
A source of pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Appropriately treated before being used	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Used in a way which contributes to effective waste management in line with the Waste Hierarchy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Used to its full capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2) Have you experienced any situation in which the use of sewage sludge in agriculture has resulted in negative effects on the environment or human beings?

Yes

No

I do not know

3) In your country of residence, and since the entry into force of the Sewage Sludge Directive (SSD), to what extent do you think that the use of sewage sludge in agriculture has had either a positive or a negative effect on ...

	Very negative effect	Negative effect	Neither negative nor positive effect	Positive effect	Very positive effect	I do not know
Soils	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surface and ground water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vegetation (trees, plants)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Animal health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban areas (i.e. areas with human settlements)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*

300 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones

4) To what extent do you agree that the SSD is coherent with the following EU Directives, Regulations and Action Plans and Strategies?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know / no opinion
Urban Waste Water Treatment Directive (91/271/EEC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fertilising Products Regulation (Regulation (EU) 2019/1009)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste Framework Directive (2008/98/EC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Water Framework Directives (2000/60/EC) (and its daughter directives)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Strategy Framework Directive (2008/56/EC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Landfill Directive (1999/31/EC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive (91/676/EEC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable Energy Directive (2009/28/EC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Efficiency Directive (2012/27/EU)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Quality Directive (2008/50/EC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Emissions Ceiling Directive (2016/2284)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Emissions Directive (2010/75/EU)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
REACH Regulation (EC 1907/2006)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General Food Law Regulation (EC No 178/2002)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy Action Plan (COM/2020/98 final)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Green Deal (COM (2019) 640 final)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farm to Fork Strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodiversity Strategy to 2020 (COM(2011) 244)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chemicals Strategy for Sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Soil Thematic Strategy (COM (2012) 46)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Methane Strategy (COM (2020) 663)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part 3: Your understanding of costs and benefits associated with the SSD

5) Considering the benefits of the SSD in terms of ensuring the safe use of sewage sludge in agriculture and the costs of its implementation (e.g.

associated with the treatment of sludge, sampling and testing, establishing permitting systems and procedures, transportation, etc.) in your country of residence and at EU level, would you say...

	The costs outweigh the benefits	The costs and the benefits are about the same	The benefits outweigh the costs	I do not know
Costs compared to environmental benefits (in your country of residence)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs compared to environmental benefits (at EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs compared to social benefits (e.g. contribution to resource efficiency, cheaper disposal of sludge, technological improvements to wastewater treatment, etc.) [in your country of residence]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs compared to social benefits (e.g. contribution to resource efficiency, cheaper disposal of sludge, technological improvements to wastewater treatment, etc.) [at EU level]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part 4: The value of the SSD

6) To what extent do you think that the SSD is still relevant to current needs regarding the following sectors at local, national, and EU levels?

	Fully	To a large extent	To some extent	Not at all	I do not know/ no opinion
The agriculture sector (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The agriculture sector (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The agriculture sector (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The waste water treatment sector (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The waste water treatment sector (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The waste water treatment sector (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodiversity protection (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodiversity protection (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Biodiversity protection (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental protection (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental protection (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental protection (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste management (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste management (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste management (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health protection (local level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health protection (national level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health protection (EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7) Do you think that your country of residence has made improvements in terms of the quality of sewage sludge used in agriculture since the SSD came into force, which would not have occurred to an identical level if the SSD did not exist?

- No, national or sub-national regulations were already in place before the SSD and are responsible for the improvements observed
- No, improvements made up until now would have happened anyway.
- No, I do not believe that the levels of sludge quality have increased in my country of residence
- Yes, levels of appropriate sludge use would have improved without the SSD, but would be lower than today
- Yes, there would have been no noteworthy improvements without EU legislation
- I do not know

Could you please briefly explain your answer, if you wish:

1500 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones
In general the mandatory treatment of sewage sludge has brought about a significant improvement

8) Do you think that there is still a need to regulate the use of sewage sludge in the agriculture sector at EU level?

- Yes
- Only for some aspects (i.e. protection of transboundary ecosystems, achieving high standards across EU for the protection of the environment, sharing practices,...)
- No
- I do not know

Could you please briefly explain your answer, if you wish:

1500 character(s) maximum

Undoubtedly there is the need for, at least, a common minimal regulation of the use of sewage sludge preventing negative impacts on the environment, human and wildlife health and agricultural products

Part 5: Specialised questions

9) Do you think that the following factors have facilitated or hindered the achievements of the SSD’s objective (to prevent harmful effects on soil, surface and ground water, vegetation, and animals deriving from the use of sewage sludge in agriculture, while encouraging its correct use)?

	Greatly hindered	Hindered	No effect	Facilitated	Greatly facilitated	I do not know/ no opinion
The incorporation of the objectives of the SSD into the national regulations of Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirements relating to concentrations of heavy metals in soils to which sludge is applied	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirements relating to concentrations of heavy metals in sludge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Requirements relating to the maximum annual quantities of such heavy metals which may be introduced into soil intended for agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The scope of the SSD (e.g. limits set, contaminants covered, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The flexibility granted to Member States to set their own controls/limits on metals based on their circumstances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allocation of funding to the implementation of the SSD by public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Knowledge about options to use sludge by stakeholders in the agriculture sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Perceptions of sludge use by stakeholders and the general public	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efforts of national/local authorities to implement the Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advocacy from NGOs/civil society groups, (consumer organisations, environmental organisations, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring of sludge production, usage, composition and properties, treatment, and recipients (as outlined in Art.10 of the SSD)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement of the SSD by national /local authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technologies and infrastructures in place at waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*:

300 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones

10) To what extent do you think that the changes in amounts of sewage sludge use and the safety of its use, which have occurred in your country of residence since the SSD came into force, can be attributed to...

	Fully	To a large extent	To some extent	Not at all	I do not know/ no opinion
The SSD and its transposition into (sub-)national law	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (sub-)national laws (e.g. establishment of more stringent measures than those mandated in the SSD)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, non-regulatory factors (e.g. new technologies, changing agricultural practices, environmental factors, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11) Do you know about any unintended effects (positive or negative) which the SSD has had, which have occurred at local, national, and/or EU level?

1500 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones

12) Do you consider the SSD to be fully coherent with the national regulations and policies on sewage sludge treatment, disposal and use of your country of residence?

- Yes
- No
- I do not know

If 'no', could you please briefly elaborate on these incoherencies, if you wish:

1500 character(s) maximum

Some Member States have taken meanwhile more stringent measures than SSD

13) The approaches that Member States have adopted to implement the SSD vary, with some setting more stringent limits than others on contaminants and, more broadly on use of sewage sludge. Do you consider that this variety of approaches has had any negative impacts?

- Yes

- No
- I do not know

If ‘yes’, could you please briefly elaborate on these incoherencies, if you wish:

1500 character(s) maximum

Different approaches can lead to different levels of protection and different levels of economic competition. The consequences are eco-dumping. Due to the different limit values, sewage sludge is transported from one member state to another.

14) To what extent do you think that the following pollutants are still relevant to regulate at EU level, and their threshold (i.e. limit values in sludge and in soils where sludge can be applied, and maximum annual load) still appropriate?

	Fully	To a large extent	To some extent	Not at all	I do not know
Cadmium (Cd) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cadmium (Cd) [Threshold is appropriate]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Copper (Cu) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Copper (Cu) [Threshold is appropriate]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mercury (Hg) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mercury (Hg) [Threshold is appropriate]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nickel (Ni) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nickel (Ni) [Threshold is appropriate]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lead (Pb) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lead (Pb) [Threshold is appropriate]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Zinc (Zn) [Regulation is relevant]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Zinc (Zn) [Threshold is appropriate]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15) Do you believe that any pollutants are missing from the requirements of the SSD?

- Yes
- No
- I do not know

If 'yes', could you please list in the following table the pollutants which you believe are missing, if you wish:

200 characters maximum

	Specific pollutants
Pharmaceuticals	EDC (Endocrine Disrupting Compounds) and microplastics
Pesticides and herbicides	
Plastics	Microplastics
Chemicals found in personal care and household cleaning products	Microplastics
Substances used during waste water treatment (including flocculants)	HC C10-C40 (heavy hydrocarbons)
Others	

16) The table below presents the most common treatment techniques and disposal and nutrient recovery methods applied to sewage sludge in the EU. To what extent do you consider these methods suitable for sewage sludge treatment, disposal, and nutrient recovery?

Pre-treatment/ processing of sludge:

	Fully	To a large extent	To some extent	Not at all	I do not know
Drying [1]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lime treatment [2]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating for pasteurisation [3]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Composting [4]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anaerobic digestion [5]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*:

300 character(s) maximum

Technical neutrality is necessary

[1] The process of removing the water from sludge

[2] Hydrated lime can be used to sanitise biosolids and convert sludge into a usable product for land application. It can be added in the sludge to raise the pH and the temperature and reduce moisture

[3] It aims to inactivate/destroy pathogenic organisms and involves heating sludge to around 70°C in order to “thicken” (dewater) it without the addition of chemicals

[4] It is a process by which naturally occurring microorganisms break down organic matter into a humus-like product for land application

[5] It is a process by which, in the absence of oxygen, bacteria break down organic matter into a humus-like product for land application, producing biogas at the same time

Disposal/ end of life use:

	Fully	To a large extent	To some extent	Not at all	I do not know
Gasification [6]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Incineration [7]	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Landfilling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Land spreading for landscaping	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Land spreading for forestry / re-forestation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Land spreading for agriculture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*:

300 character(s) maximum

Technical neutrality is necessary

[6] Sludge with low content of water is heated with a controlled amount of oxygen and vaporised, producing a synthetic gas used in gas motors or in drying sludge

[7] Sludge is combusted with or without energy recovery

Nutrient recovery:

	Fully	To a large extent	To some extent	Not at all	I do not know
Precipitation of phosphoric minerals from sludge [8]	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery of nutrients from incineration ashes [9]	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pyrolysis [10]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*:

300 character(s) maximum

Technical neutrality is necessary

[8] This allows extraction of phosphorus through a chemical reaction either before or after dewatering of sludge.

[9] Extraction of phosphorus from incineration ash through physico - chemical methods.

[10] Dried sludge is heated in an anaerobic process producing biochar, pyrolytic oil and biogas. Phosphorus ends up in the biochar.

17) To what extent do you think that the SSD has been – and still is – able to respond to the following potential new issues and emerging risks?

	Fully	To a large extent	To some extent	Not at all	I do not know/ no opinion
Increased quantities of contaminants in sludge due to improved treatment of waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dealing with substances other than the heavy metals already regulated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dealing with contaminants of emerging concern	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Variation in the levels of limit values for pollutants covered by the SSD and other relevant substances across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify*:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify*:

300 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones

18) Is there anything that you wish to add about the added value (or lack thereof) of EU interventions which have occurred up until now with regards to the SSD, in comparison to what would have happened if the SSD did not exist?

1500 character(s) maximum

We cannot provide a common EU answer as national Regulations impact more than EU ones

Part 6: Final questions

19) If you wish to expand on any of your answers or if you wish to add comments or information on anything else, which is relevant to the Evaluation, please do so in the box below.

As mentioned before, an EU wide common answer is not possible for FEAD to be developed for many issues, as national legislations impact more than the EU ones.

We would like the following rules to be kept in mind while revising the current SSD:

- In the context of the European Green Deal and the Circular Economy Action plan, the treatment and safe recovery of sewage sludge, the valuable biological resource resulting from wastewater treatment, needs to be carefully considered.
- A revised SSD must reflect the waste hierarchy established in Article 4 of the waste Framework Directive and by setting consistent limit values for pollutants such as heavy metals. It has to be ensured that rules for a safe and innovative Phosphorus recovery, which is a critical raw material by EU Commissions definition, are laid down in the SSD for a sustainable use of sewage sludge.

FEAD would like the new directive to propose several options for sludges treatment with respect to the European waste hierarchy and considers that the different ways of treatment are complementary and does not wish to oppose to them:

1) Material and organic recovery through return to soil if compliance with environmental criteria

2) Energy recovery:

- o Methanisation which involves both material (agronomical) and energy recovery
- o Pyrolysis-Gasification generating syngas and biochar
- o Incineration (energy and phosphorus recovery).
- o Incineration without phosphorus recovery.
- In Southern Europe there is an increasing soil desertification: all the available organic sources should be properly valorised including the sewage sludge, provided that safe conditions are guaranteed
- On the one hand, in the last decades a number of new technologies to recycle Phosphorus from sewage sludge were developed and some already became market available. Therefore, it is key to develop a new and innovative legal framework for the treatment of sewage sludge with a vision for a sustainable phosphorus cycle in the EU. That goal has to be reflected in the SSD.
- On the other hand, a safe and efficient use of treated sewage sludge-products, which meets strict quality standards should be maintained as a viable solution, as a proven means of returning valuable nutrients, Phosphorus and Nitrogen, and organic carbon to the cycle. This does not necessarily have to be achieved by technical processes. The soil-related use of sewage sludge as fertilizer is also a form of P-recycling. It is crucial that land use criteria are identical or at least consistent between the different fertilizing materials and crop supports (concerning the safety threshold, agronomic efficiency, dose input, etc.). For that reason, a quality assurance system for sewage sludge products should be established, ranging from the examination of the recorded wastewater origins to the treatment process (treatment, digestion and conditioning) and product testing. This quality assurance system should set uniform limit values throughout the EU. Furthermore, spreading of "biosolids" by return to the soil (directly or after composting) helps to reduce global warming, counteract the constant loss of soil organic matter and allow independence in the use of synthetic fertilisers.
- It must also be ensured in the future that no wet or direct application of sewage sludge takes place! The treatment of sewage sludge prior to application is essential.

20) If you consider there are materials / publications available online that should be considered further in relation to this evaluation exercise, please feel free to describe them (title and author) in the box below and include any relevant links.

Do you have additional information that you would like to share in a concise document such as a position paper? (This is optional and will serve as additional background to better understand your position.)

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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