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FEAD feedback to the Commission's initiative for amending Regulation (EU) 2019/1009 on the requirements applicable to EU fertilising products

FEAD, the European Waste Management Association, representing the private waste and resource management industry across Europe, **is fully committed to the objectives of the European Green Deal and the Circular Economy Action Plan** as essential tools for providing the adequate stimuli to our economy while pushing forward EU Climate goals through the circular economy.

FEAD welcomes the objective to improve and facilitate internal market access for fertilising products that are agronomically efficient, safe and already widely traded on the market, in particular to adapt the requirements laid down for these component material categories to technical progress.

As stated in the JRC report, digestate is often used in agriculture, either as a whole or following separation of solid and liquid fractions: in fact, in some plants the digestate is dewatered, resulting in a separated liquor and a separated semisolid fraction.

The solid fraction may undergo additional treatments such as post-composting or drying. The liquid from the process is recycled back into the process to a large extent, and the excess, if any, can be used as a liquid fertiliser if the quality allows this. The liquid fraction, when not used on agricultural land, may also undergo a treatment similar to wastewater to produce a clean water fraction.

The mechanical separation of the solid and liquid fractions of a digestate is a commonly used method in some Member States and seems to be well-established. **Therefore, FEAD strongly supports the Regulation (EU) 2019/1009 to be amended to include post digestion process, under the conditions that the additives used do not exceed a certain concentration and are registered in accordance with Regulation (EC) No 1907/2006.**

Allowing these processes in Regulation (EU) 2019/1009 is necessary both to regulate a common practice already in use in a number of installations, and to facilitate the access to the internal market of EU fertilising products, creating new opportunities for the recovery of bio-waste.

This is very important because there is a lot of room for improving and increasing the separate collection of bio-waste, the volumes of this type of waste are definitely growing. About 50 % of the municipal bio-waste generated is collected separately in the countries that provided data (weighted average). The remaining 50 % of municipal bio-waste is collected with residual (mixed) waste. The separate collection rates vary from 80 % or more in Austria and Slovenia to less than 10 % in Bosnia-Herzegovina, Cyprus, North Macedonia, Portugal, Spain and Turkey, demonstrating that, at an individual country level there remains ample room for improvement¹.

FEAD welcomes also the inclusion of other processes, beside the mechanical separation, used to remove water from a digestate or its fraction, as long as these processes do not chemically modify the materials, but it would be useful to explicit include the chemical and thermal processes, which are widely used to remove water.

¹ <https://www.eea.europa.eu/publications/bio-waste-in-europe/download>

In some digestion plant where the biogas is used for power production, the heat can be used for **thermal drying** of the solid part of the digestate in order to obtain a higher dry matter content. This process produces a product that is physically much more similar to compost even with the possibility to extrude to obtain pellets.

Really important can also be the possibility to remove soluble ammonium from the digestate for the recovery of nitrogen, but also the possibility to use the remaining digestate in fertilizing products.

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