



ECN feedback to European Commission roadmap on a new circular economy action plan

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The European Compost Network (ECN) welcomes the initiative of the European Commission to adopt a new Circular Economy Action Plan with the objective to boost the circular economy model in the EU and abroad. ECN welcomes the planning of new measures to establish a functioning and competitive integrated market for secondary raw materials and recommends that **circularity of biological loops is fully addressed by**

- I. Providing legal certainty to downstream operators;
- II. Enforcing the development of high-quality separate collection schemes of biowaste and other recyclables;
- III. Promoting the use of organic soil improving products over mineral fertilizers.

Anaerobic digestion (AD) and composting are the most suitable processes of biowaste:

- They employ safe and easy-to-replicate technology, from small to large scale;
- They provide local jobs in all EU countries, especially in rural areas, and can be built and operated at relatively low cost, compared to incineration plants;
- AD contributes to offset fossil fuels by generating renewable energy;
- Compost and digestate will provide sustainable organic supply of nutrients to agriculture, including phosphorus which is a critical raw material.

As up to 50 % of municipal solid waste is organic, bio-waste plays an important role in recycling and the circular economy. There is big room for improvement as only about 40 % is currently recycled into high quality compost and digestate.

ECN welcomes the objective to reduce waste generation and strongly supports to update certain waste laws so that they further contribute to the circular economy. ECN warmly recommend the Commission to

- I. Adopt EU End-of-Waste criteria for compost and digestate;
- II. Prevent landfilling bio-waste;
- III. Enforce mandatory separate collection of bio-waste – e.g. by adopting targets for separate collection;
- IV. Remove unnecessary regulatory barriers to safe treatment of animal by-products – e.g. digestate from farm fertilizer – and derived products.

ECN strongly advocate in favour of closing organic cycles for biological materials. There is the need to develop a comprehensive strategy to build up organic matter in soils. Compost and digestate have optimal fertilizing properties. They are organic fertilizers which supply nutrients to the plants and build up soil organic matter in soils, once applied regularly. Organic matter will help maintaining and restoring soil quality, structure and its much-needed water retention capacity. This means that soils will not dry out quickly in summer months, when water is scarce but also that the likelihood of flooding in winter is reduced.

A healthy soil also works as a huge carbon sink and therefore it can sequester even more carbon. Once applied to soils, organic matter, e.g. compost and digestate, which is rich in organic carbon, ensures carbon storage for many decades.

ECN warmly agrees to raise the awareness of consumers on greenwashing claims and involve them to contribute to the realization of the circular economy. ECN knows the importance of consumers' participation in management of commons – e.g. participation in municipal waste separate collection schemes. **ECN understands that when overwhelmed with information, users and consumers struggle to understand how to make the right choice** that would allow them to respect the environment and mitigate climate change. **ECN welcomes the planned sustainable product policy** and recommends the minimum requirements on products to be easy to understand and effective, and to include organic fertilizing and soil improving products under their scope.

ECN warmly invites the Commission to support stakeholders dialogue by enhancing the role and resources of the European Circular Economy Stakeholder Platform. As an important tool that contributes to efficient policy making, ECN also recommends improving Eurostat waste statistics by including, for example, **separate collection** figures for municipal bio-waste and commercial/industrial bio-waste.

About ECN

The European Compost Network (ECN) is the leading European membership organisation promoting sustainable recycling practices in composting, anaerobic digestion and other biological treatment processes of organic resources. Its purpose is to work with practitioners, researchers, technicians and policy makers to deliver integrated organic waste recycling solutions that generate high quality products for the benefits of the environment and the users of the recycled products. It serves as central resource and network for the organic waste recycling sector in Europe, as well as the emerging bio-based economy. ECN represents more than 4.500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.

ECN's vision is a Europe in which all organic resources are recycled and recovered in a sustainable way. From this vision, ECN's primary goal is to support the implementation of EU waste policies and thereby contributing to the development of a recycling society, to sustainable agriculture and energy recovery, to improve human health and to create overall added value within the European market. To achieve this, we believe that effective recycling in all Member States should be built on appropriate collection systems for organic waste to promote high quality products derived from biological treatment. ECN supports this development through implementation programmes for Member States; the development of EU quality assurance systems for compost and digestate; and, guidelines for the monitoring of operational processes within compost and digestate facilities