

ECN feedback on the JRC-Interim Report 'Technical proposals for by-products as component materials for EU Fertilising Products'

Version 2 from 27 November 2020, regarding the introduction of a new 'CMC WW high purity materials'

The European Compost Network (ECN) welcomes the new approach presented by JRC in the Fertiliser Expert Group meeting on 18 March by adding a new 'CMC WW' complementary to CMC 11 in the EU Fertiliser Products Regulation (FPR). This new 'CMC WW' should cover 'high purity materials' produced as an integral part of the production process from gas purification and emission control systems. These materials are by-products from the treatment process of non-hazardous waste materials from gas cleaning processes and stripping. The quality of the material is not influenced by the process. Materials derived from the aerobic and anaerobic treatment of bio-waste are assigned to this group as so-called 'ammonium sulphate solution.'

ECN also sees the need to define an end-of-waste status according to Article 10 FPR and to clearly specify that these materials undergo REACH registration.

ECN generally supports these requirements and specifications as laid down in the draft proposal by JRC. In the ECN statement from June 2020, we expressed our deep concern about the preliminary decision not to follow further assessments for ammonium sulphate from municipal and industrial effluent treatment etc.

Anaerobic digestion, as a biological treatment technique, will increase in Europe in the future and the recycling of ammonium sulphate from air purification via air scrubbers will become more and more important. Therefore, adding a specific component material category for these high-purified materials in the FPR is welcomed.

Regarding the required qualities, we assume that a sufficient quality for these materials is given by requesting external certification according to Module D1 of the FPR for CMC 3 / 5 materials. At present, we are not aware of any other trace element concentrations or contents of other contaminants in these 'ammonium sulphate solutions' produced as gas purification materials from composting and anaerobic digestion processes in Europe.

There are different legal requirements within the EU Member States for the use of 'ammonium sulphate solution' as a fertiliser. Therefore, we support setting harmonised criteria for these materials in the EU Fertilising Products Regulation.

Thanks in advance for taking up this new approach!