

Commission expert group on Fertilising Products
Meeting of 18/04/2023
Item 3.3/18/04/2023

Note from the European Compost Network ECN e.V.

On

Item 3.3 FAQ Annex II

2.4 Can plants, which are waste or by-products, be used as input material in CMC 5, digestate?

ECN calls again for a general elimination of all waste materials according to the definition of bio-waste on Directive 2008/98/EC in CMC 2, 4, 6 and 11. The inclusion of non-processed or mechanically processed organic plant materials and other organic waste materials (as waste materials from the food and feed processing industry) in other CMCs with no adequate stringent treatment, control and quality assurance requirements according to CMC 3 and CMC 5 (which guarantee the decomposition and hygienisation of the materials), will result in an underinsured, not CE-equivalent product quality.