

### ECN's feedback on the revision of the Public Procurement Directives

The European Compost Network (ECN), the European umbrella organisation representing the bio-waste recycling sector, welcomes the initiative from the Commission to revise the Public Procurement Directives. Public procurement accounts for around 15% of the EU's GDP, with public authorities spending over 2.6 trillion euros every year to purchase services, works and supplies. It therefore offers enormous potential for steering public spending towards greater sustainability, and for encouraging the use of circular materials. The 2014 Public Procurement Directive offers Member States the possibility to use environmental criteria for products and services through green public procurement. Although such criteria have been developed, they remain voluntary which hinders the widespread implementation of green public procurement in all Member States. For this reason, the ECN calls the Commission to make green public procurement mandatory.

In its Bioeconomy Strategy published in November 2025, the Commission stated that the revision of the Public Procurement Directives should promote and facilitate the public procurement of biobased solutions. The ECN welcomes the consideration of biobased materials in public procurement, but believes it is necessary to go even further. Adopting mandatory green public procurement criteria would oblige contracting authorities to use recycled bio-based products, for example in gardening activities. Existing voluntary criteria already foresee that soil improvers can contain materials derived from the recycling of separately collected bio-waste<sup>1</sup>. These bio-waste-derived materials, i.e., compost and digestate, are particularly relevant for the management of green spaces by municipalities, as they can substantially improve soil productivity and bring key environmental benefits to the soil<sup>2</sup>. Making these green public procurement criteria binding and providing for similar requirements for all fertilising products (e.g., fertilisers, soil improvers, growing media) used by municipalities would incentivise the use of circular products and support the market.

The ECN also believes the green public procurement criteria should include a mandatory minimum recycled content for nutrients and organic matter. This is in line with Article 26 of

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<sup>1</sup> EU Green Public Procurement Criteria, Criteria for Public space maintenance, <https://circabc.europa.eu/ui/group/44278090-3fae-4515-bcc2-44fd57c1d0d1/library/3dbf0d36-3a89-4a31-a96f-e0cd06fda842/details>.

<sup>2</sup> See Fact Sheet 2, The sustainable use of compost, Soil fertility and productivity, European Compost Network, 2020, <https://www.compostnetwork.info/download/soil-fertility-productivity/>.

the Critical Raw Materials Act which requires Member States to adopt measures to increase the use of secondary critical raw materials, including by taking recycled content into account in award criteria related to public procurement, phosphorus being listed as a critical raw material. Digestate and compost from separately collected bio-waste are also recognised as having a relevant critical raw materials recovery potential in a draft implementing act from the Commission<sup>3</sup>. Indeed, green public procurement can be a tool to reduce dependencies on imported raw materials but also to improve soil health by maintaining and improving organic matter. Soil organic matter improves the soil structure by increasing the soil microbiological activity, and reduces soil compaction and erosion. The ECN welcomes the Commission's intention to introduce Made in Europe criteria and suggest that these be applied to organic fertilisers and soil improvers.

Therefore, the ECN would like to reiterate that since compost and digestate derived from bio-waste can be considered as local circular products that bring key ecosystem benefits to the soil, their use should be taken into account and incentivised in public procurement. To this end, the Commission should also consider the need to provide support and guidance to contracting authorities in order to facilitate their transition to bio-based products.

### Contact

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### About the European Compost Network (ECN)

The ECN is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers and soil improvers. With 67 members from 27 European countries, ECN represents more than 4,500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.

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<sup>3</sup> Commission draft Implementing Regulation listing the products, components and waste streams considered as having a relevant critical raw materials recovery potential under Regulation (EU) 2024/1252, Ref. Ares(2025)5155732 - 27/06/2025.