



EUREAU

**EUREAU POSITION PAPER on  
how the revision of the Fertiliser Regulation should promote  
sustainable use of sludge in agriculture**

29 March 2012

**Summary**

**Purpose of the position:**

- To promote the understanding at EC level on how future EC policy should promote sustainable use of sludge in agriculture. Such a development is in perfect line with the EC priorities under EU2020 strategy and its flagship initiatives: on Resource efficiency, Energy Targets 2020, and on the Innovation Union.
- A key to a sustainable use of sludge in agriculture are future EC policies as the Fertiliser Regulation<sup>1</sup>. It is therefore important that the Fertiliser Regulation and the end-of-waste criteria under the Waste Framework Directive aim to a long term sustainable use of sludge and sludge-based products as a soil improver and fertiliser on agriculture land.

**Summary and main messages from EUREAU regarding sustainable use of sludge in agriculture, energy targets 2020 and resource efficiency**

1. This position paper covers mainly **sustainable use of sludge** from waste water treatment plants (WWTP) **in agriculture**. EUREAU is aware of other ways of sustainable use of sludge as e.g. energy and resource recovery from incineration of sludge.
2. Future EC policies are most important as driving forces to promote sustainable use of sludge and sludge-based products in agriculture. **Coherence with energy, resource, water and waste policies are now essential.**
3. Sewage sludge production is an unavoidable consequence of wastewater treatment, and is rising all over the EU due to the improvement of wastewater treatment all around EU. **Sewage sludge is source of nutrients, mainly phosphorus and nitrogen, of organic matter, and of energy.** The energy is produced through treatments as anaerobic digestion but also when incinerated. Sludge management should feature highly in a sustainability framework and has to be promoted by the reviewed Fertiliser Regulation including sludge and biowaste.

**EUREAU calls for:**

1. The view that **sludge should be managed as a resource** (e.g. phosphorous and other nutrients and as a soil improver) in line with current EU thinking embodied in various policies as in the EU 2020 flagship initiative on the efficient use of resources.
2. To **promote a sustainable use of sewage sludge and sludge-based products in agriculture** is also to promote **an increased biogas production without compromising the objectives of the Water Framework Directive (2000/60/EC)**. This action is clearly in line with EU Energy targets for EU 2020.
3. **Within the Waste policy**, the current discussion on the “end-of-waste” (“EoW”) status is an opportunity for **some sludge based products (e.g. composted sludge) to be recognised as a useful fertiliser** when achieving high quality criteria. This status might currently be relevant to only a small proportion of sewage sludge production across Europe, but could be **an incentive to improve the quality of recycled sludge** and so enhance its image and acceptability. **The “end-of-waste” criteria should also focus on the output, through specification on final product quality rather than by prohibiting input materials as sludge.**
4. **Control of pollution at source** should be the absolute priority for limiting hazardous substances entering the environment with positive impacts on the sludge quality as well as receiving waters. **In the long term the sludge quality regarding heavy metals and organic contaminants will continue to improve**, resulting from the strategy on controlling chemicals at source supported by the EC chemicals policies as REACH and regulations on personal care products, biocides and pesticides. **EUREAU calls for strong implementation of the chemicals legislation.**

<sup>1</sup> That is under review in 2012

## 1. Introduction

There are currently several EC priorities under EU2020 strategy<sup>2</sup> and its flagship initiatives on Resource efficiency<sup>3</sup> and on Innovation Union<sup>4</sup>. The EU2020 energy strategy<sup>5</sup> calls for alternative resources of energy. It is now important to promote the understanding on how future EC policy could help the sustainable use of sludge on agriculture land. Such a development is in perfect line with the EC priorities under EU2020 strategy and the flagship initiatives on Resource efficiency and on Innovation Union. A key to a sustainable use of sludge in agriculture are future EC policies as the Fertiliser Regulation that is currently under revision<sup>6</sup>. The Fertiliser Regulation should aim to a long term sustainable use of sludge and sludge-based products as a soil improver and fertiliser on agriculture land.

Sewage sludge production is an unavoidable consequence of wastewater treatment, and is rising all over the EU. Sewage sludge is source of nutrients, mainly phosphorus and nitrogen, of organic matter, and of energy. Sludge is one of the daily byproducts of the waste water treatment process; in the EU it is produced in more than 30 000 tonnes (dry matter) per day and will increase with at least 10 % until 2020. Sludge has to be considered as an important part of the entire urban water cycle, as an energy resource for biogas production and, for sludge with a good quality, as a soil improver and fertiliser in agriculture, forestry and other land use options.

Therefore EUREAU, representing more than 70,000 water utilities all over Europe, has its **common position for a sustainable use of sludge on agricultural land, where sludge is applied (a) without compromising the objectives of the Water Framework Directive (2000/60/EC), (b) without compromising the future quality of ground water, and (c) in accordance with local or national considerations related to the protected areas for water abstraction.**

## 2. EUREAU position

### 2.1. **EUREAU on sustainable sludge use and a resource-efficient Europe – Flagship initiative of the Europe 2020 Strategy**

- The flagship initiative for a Resource Efficient Europe under the Europe 2020 strategy supports the shift towards a resource-efficient, low-carbon economy to achieve sustainable growth.
- Recycled resources underpin the European economy and our quality of life. Continuing the current patterns of resource use is not an option. Increasing resource efficiency is a key to securing growth and jobs for Europe. It will bring major economic opportunities, improve productivity and innovation, drive down costs and boost competitiveness.
- The flagship initiative for a Resource Efficient Europe provides a long-term framework for actions in many policy areas, supporting policy agendas for climate change, energy, transport, industry, raw materials, agriculture, fisheries, biodiversity and regional development. This is to increase certainty for investment and innovation and to ensure that all relevant policies strengthening resource efficiency in a balanced manner.

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<sup>2</sup> [http://ec.europa.eu/europe2020/index\\_en.htm](http://ec.europa.eu/europe2020/index_en.htm)

<sup>3</sup> [http://ec.europa.eu/resource-efficient-europe/index\\_en.htm](http://ec.europa.eu/resource-efficient-europe/index_en.htm)

<sup>4</sup> [http://ec.europa.eu/research/innovation-union/index\\_en.cfm](http://ec.europa.eu/research/innovation-union/index_en.cfm)

<sup>5</sup> [http://ec.europa.eu/energy/index\\_en.htm](http://ec.europa.eu/energy/index_en.htm)

<sup>6</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:304:0001:0194:en:PDF>

**EUREAU calls for:**

**The view that sludge should be managed as a resource (e.g. gas/energy, phosphorous and other nutrients and/or as a soil improver) in line with current EU thinking embodied in various policies as in the EU 2020 flagship initiative on the efficient use of resources.**

**2.2. EUREAU on biogas production, sustainable sludge use and the energy targets for EU 2020**

- EU Energy targets for EU 2020 are:
  - greenhouse gas emissions 20% (or even 30%, if the conditions are right) lower than 1990;
  - 20% of energy from renewables;
  - 20% increase in energy efficiency.
- The Commission's approach to decarbonisation is firmly grounded in the EU's growth agenda, set out in the Europe 2020 strategy. The climate and energy targets for 2020 will contribute to the achievement of a smart, sustainable and inclusive economy which should help the EU and the Member States deliver high levels of employment, productivity and social cohesion. It is in this framework that long-term roadmaps are being prepared.
- A possible increase of biogas production in Europe is strongly linked on future legislation which is able to promote to close the eco-cycles by an increased sustainable use of the byproduct from biogas, the digestate in the form of sludge or biowaste. More EU support for a sustainable use of sludge and biowaste on agriculture land will therefore also be a support to more biogas production in the EU. Sustainable means in this respect at the same time not compromising the objectives of the Water Framework Directive.

**EUREAU calls for:**

**To promote a sustainable use of sewage sludge in agriculture is also to promote an increased biogas production without compromising the objectives of the Water Framework Directive.** This action is clearly in line with EU Energy targets for EU 2020.

**2.3. EUREAU on sewage sludge, end-of-waste status and recovery of organic matter and nutrients**

- Sewage sludge production is an unavoidable consequence of wastewater treatment, and is rising all over the EU.
- For recovery of organic matter and nutrients, the current sludge directive (86/278/EEC)<sup>7</sup> has proven its effectiveness as a guide to improve sludge quality and sludge end users confidence. Nevertheless, this directive is outdated and its review has unfortunately been postponed so that **a clear legal tool to support sludge recovery is missing**. In the meantime, the EC announced a recast of the landfill directive, with a phase-out of landfilling of biodegradable wastes (including sludge) by 2020-2025.
- EUREAU is concerned that, for different reasons (environmental concerns, social acceptability, costs, innovation needs and legal constraints), each major route for sludge handling (organic recovery, incineration, landfilling) will become more and more complex to deal with.

<sup>7</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31986L0278:EN:HTML>

- For recovery of organic matter and nutrients, **EUREAU calls for a legal tool promoting a sustainable use of sludge in agriculture**. A revision of the sludge directive under the umbrella of Waste policy is one possible approach, but due to the sludge characteristic to provide nutrients for soils and crops, alternative approaches will now arise under the revision of the fertilizer regulations.

**EUREAU calls for:**

1. Within the Waste Framework policy<sup>8</sup>, the current discussion on the “end-of-waste” (“EoW”) status is an opportunity for some sludge based products (e.g. composted sludge) to be recognised as a useful fertiliser when achieving high quality criteria. This status might currently be relevant to only a small proportion of sewage sludge production across Europe, but could be an incentive to improve the quality of recycled sludge and so enhance its image and acceptability. **The “end-of-waste” criteria should also focus on the output, through specification on final product quality rather than by prohibiting input materials as sludge.**
2. ***Control of pollution at source*** should be the absolute priority for limiting hazardous substances entering the environment with positive impacts on the sludge quality as well as receiving waters. ***In the long term the sludge quality regarding heavy metals and organic contaminants will continue to improve***, resulting from the strategy on controlling chemicals at source supported by the EC chemicals policies as REACH and regulations on personal care products, biocides and pesticides. ***EUREAU calls for strong implementation of the chemicals legislation.***

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<sup>8</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:en:PDF>