



To: Aneta Williams,
Head of Unit, DG Environment Unit C.4. Industrial emissions
European Commission

30th September 2015

Object: input on **Best Available Techniques (BAT) Reference Document for the Intensive Rearing of Poultry or Pigs**, Final draft August 2015
<http://eippcb.jrc.ec.europa.eu/reference/irpp.html>

ESPP welcomes this proposed new BAT BREF which will have positive impacts in reducing environmental impacts of large pig and poultry farms, in particular with the new obligations for

- Ammonia emissions
- Nitrogen and phosphorus excretion limits per animal per year
- Fully slatted floors (obligatory for new installations only)
- Plus a range of other BAT specifications including water use, energy consumption, noise, dust, odour.

We underline however that **it is important that farmers can pass on implementation costs** to supermarkets and consumers, particularly in the current context of high pressure on farm incomes, including as a result of competition with imported food products which do not respect such production quality requirements.

The specifications concerning **nutrient levels in animal feeds, precision feeding and the use of appropriate additives (e.g. phytase)** to improve nutrient uptake are important both to reduce nutrient emissions (inc. in manures) and to improve nutrient efficiency.

Regarding manure treatment, some clarification would be useful: the states that it addresses “on-farm” systems but includes techniques such as combustion of poultry manure or electro-oxidation. We would recommend to clearly widen to centralised processes, as depending on logistics and context, it can be more efficient to treat manures in larger / centralised installations, sometimes after an initial treatment on-farm (e.g. biological treatment or anaerobic digestion).



We note that **at-source measures, such as slatted housing** (which separate solid and liquid fractions) are important to improve manure treatment and valorisation potential.

Also, the information on manure treatment processesⁱ should be revised to better address nutrient recovery. This section is in places out of date or incompleteⁱⁱ. We would suggest to start preparation of a specific BAT on manure treatment, enlarging to cover also cattle manure, covering both on-farm and centralised systems, **taking an approach of manure valorisation** (recycling of nutrients, recovery of energy, reuse of water). This should also cover possible co-treatment with other organic wastes (e.g. biomass, food waste) where this can improve resource recovery. It should address techniques (including upstream in feeding) to minimise contaminants and improve nutrient balance in manures, to facilitate valorisation.

We hope that these comments will be useful

Yours sincerely

Arnoud Passenier, President, European Sustainable Phosphorus Platform

ⁱ Manure processing techniques covered under “On-farm processing of manure” (4.12) covers: Mechanical separation of slurry (Screw press and auger separators, Decanter-centrifuge separator, Coagulation – Flocculation, Sieve separation, Filter presses), Biological treatment of slurry (Aerobic digestion (aeration), Nitrification – denitrification), Composting of solid manure, Anaerobic digestion of manure in a biogas installation, Anaerobic lagoon system, Evaporation and thermal drying, External tunnel for manure drying, Slurry acidification, Combustion of poultry litter for energy recovery, Ammonia stripping, Manure additives, Slurry and wet manure belt dryer. Processes indicated under “Emerging techniques” (6.3) are: Combined biological manure treatment and ammonia stripping, Phosphorus separation by gypsum based precipitate, Electro-oxidation/electro-coagulation, Struvite precipitation.

ⁱⁱ e.g. P-separation by gypsum-based precipitation is not today pertinent, ammonia stripping is applicable to the liquid fraction of manure only after solid-liquid separation not after biological treatment, magnesium addition is not always necessary for struvite precipitation