

15<sup>th</sup> October 2018

On behalf of the signatory organisations indicated below (*list of signatories updated 16/11/2018*)

To: Rapporteurs for the European Parliament and for Council, to Shadow Rapporteurs and Member States Permanent Representatives to Council

To: Elżbieta Bieńkowska,

European Commissioner for Internal Market, Industry, Entrepreneurship and SMEs

To: Jyrki Katainen,

European Commissioner for Jobs, Growth, Investment and Competitiveness

**Object: Conclusion of the EU Fertilising Products Regulation**

Dear Rapporteurs, dear Ms Bieńkowska, dear Mr Katainen

The Circular Economy in Europe is a core element of the current European Commission's strategic objectives.

The proposed new EU Fertilising Products Regulation is a flagship initiative of the Commission's Circular Economy Package. It is an ambitious legislative proposal which will open a new approach to product legislation, important for the development of the Circular Economy because it addresses barriers for recycled materials.

This new Regulation is strongly awaited by industry and stakeholders to enable development of secondary fertilising products, to open the European market for recycling technologies and to stimulate investment in new processes. Furthermore, safety and quality will be clarified, and farmers will have better information and better choice of product, with co-existence of both EU-Label and national fertilisers.

Circularity in the fertilising products industries means employment, including many non-displaceable jobs in rural areas (where recyclable nutrient materials such as manure or crop by-products are produced), and reduced dependency on imports. Estimations suggest that recycling of all biowaste in Europe would generate 320 000 direct and indirect jobs. The mineral fertilisers industry already today employs nearly 100 000 people in Europe with more than half of its products using by-products as inputs. Phosphorus recycling alone could create some 60 000 new jobs. (Different sources)

However, we are increasingly concerned that this frontrunner legislative proposal of the current Commission's Circular Economy objectives may in fact not achieve adoption. The proposal is, it seems, "stuck" in trilogue. There appear to be both political blockages and also difficulties to finalise workable solutions on important technical issues. These technical questions include by-products, animal by-products, realistic conformity assessment requirements, respect of normal REACH requirements, chemical reactions between CMCs, amongst others, as well as wording clarifications. Progress is being made on some of these.

The coming months and the Austria presidency probably represent a critical window for finalisation of this flagship Regulation, before the approach of European Parliament elections. We know that DG GROW services have consistently engaged to support trilogue and appreciate that the resources of the Unit have now been reinforced to facilitate this.

For these reasons, we hope that, together, Council, Parliament and the European Commissioners concerned can take the political initiative necessary to finalise the trilogue on the Fertilising Products Regulation as a flagship for the Circular Economy.

We would be happy, to discuss any aspects of this Regulation further with you and your colleagues or services.

*List of signatory organisations (as at 16<sup>th</sup> November 2018) follows*

**Aarhus Vand** (water solutions, Denmark)  
Contact: Per Overgaard Pedersen, Chief Engineer, Wastewater Treatment and Resource Recovery [POP@aarhusvand.dk](mailto:POP@aarhusvand.dk)

**AEBIG** (Asociación Española de Biogás)  
Contact: Luis Puchades [l.puchades@aebig.org](mailto:l.puchades@aebig.org)

**Agricultural Research Council Czech Republic**  
(promoting environmentally friendly agriculture)  
Contact: Jiri Holas, [jiri.holas@arcnet.cz](mailto:jiri.holas@arcnet.cz)

**AquaMinerals** (water sector resource recycling company, The Netherlands)  
Contact: Olaf van der Kolk, Director [vanderkolk@aquaminerals.com](mailto:vanderkolk@aquaminerals.com)

**Aquawaters Associates** (environmental consultancy)  
Contact: Barbara Anderson, President  
[serenewaters.barbara@gmail.com](mailto:serenewaters.barbara@gmail.com)

**Asociația Română a Compostului** (Romanian Compost Association)  
Contact: Valentin Feodorov, President, [office@asociatiacompostului.ro](mailto:office@asociatiacompostului.ro)

**ATB** (Leibniz-Institut für Agrartechnik und Bioökonomie, Germany)  
Contact: Dr. Jürgen Kern [jkern@atb-potsdam.de](mailto:jkern@atb-potsdam.de)

**ATEE Club Biogaz** (French Biogas Association)  
Contact: Arnaud DIARA, Project manager [a.diara@atee.fr](mailto:a.diara@atee.fr)

**Austrian Compost & Biogas Association**  
Contact: Franz Kirchmeyr [kirchmeyr@european-biogas.eu](mailto:kirchmeyr@european-biogas.eu)

**Baltic Sea Action Group (BSAG)**  
Contact: Laura Hoijer, Content Director [laura.hoijer@bsag.fi](mailto:laura.hoijer@bsag.fi)

**BHU Umwelttechnik** (Environmental Technology, Water and Sludge)  
Contact: Stefan Köppl (CEO) and Dr. Alessandro Meda (CTO)  
[alessandro.meda@bhu-et.de](mailto:alessandro.meda@bhu-et.de)

**Bioenergy Europe**  
Contact: Jean-Marc Jossart, Secretary General,  
[Jossart@bioenergyeurope.org](mailto:Jossart@bioenergyeurope.org)

**Bioenergy2020+** (Austria)  
Contact: Dr Bernhard Drosig [bernhard.drosig@bioenergy2020.eu](mailto:bernhard.drosig@bioenergy2020.eu)

**BioEngine** (green process engineering and biorefineries)  
Contact: Céline Vaneckhaute, Director  
[celine.vaneckhaute@gch.ulaval.ca](mailto:celine.vaneckhaute@gch.ulaval.ca)

**Biogas-E**  
Contact: Mieke Decorte [mieke.decorte@biogas-e.be](mailto:mieke.decorte@biogas-e.be)

aarhusvand



**BIOMASA PENINSULAR** Services  
(technology, bio-products from biowaste)  
Contact: José M. Gómez Palacios, Director [jmgomez@bpeninsular.com](mailto:jmgomez@bpeninsular.com)



**Biorefine Cluster**  
Contact: Erik Meers [Erik.Meers@UGent.be](mailto:Erik.Meers@UGent.be)

**BMC Moerdijk** (thermal conversion of poultry manure, Netherlands)  
Contact: Kees de Regt, Managing Director [kees.deregt@bmcmoerdijk.nl](mailto:kees.deregt@bmcmoerdijk.nl)



**BTS Biogas** (Biogas & Biomethane Plants – Italy, UK, France, Japan)  
Contact: Michael Niederbacher, CEO&Chairman  
[m.niederbacher@bts-biogas.com](mailto:m.niederbacher@bts-biogas.com)



**Bulgarian Water Association (BWA)**  
Contact: Ivan Ivanov, President [ivjean@abv.bg](mailto:ivjean@abv.bg)



**CARBOLIVA** (Energy and Biochar, Spain)  
Contact: Juan Turrion, Technical Director [juanturrion@carboliva.es](mailto:juanturrion@carboliva.es)



**CETAQUA** (Water Technology Center)  
Contact: Nicolás de Arespacochaga Santiago  
Wastewater and Resource Recovery Area Manager De  
[narespacochaga@cetaqua.com](mailto:narespacochaga@cetaqua.com)



**Christoph Fischer GmbH - EM-Chiemgau**  
Contact: Christoph Fischer, Managing Director  
[christoph.fischer@em-chiemgau.de](mailto:christoph.fischer@em-chiemgau.de)



**CIMO** (Compagnie industrielle de Monthey, Switzerland)  
Contact: Blandine Maisonnier, Responsible for the Sepholix project



**CIRCULAR CARBON** (Biochar Consulting Company, Germany)  
Contact: Felix Ertl, CEO, [felix.ertl@circular-carbon.com](mailto:felix.ertl@circular-carbon.com)



**CNP CYCLES** (nutrient recovery, Germany)  
Contact: Rudolf Bogner, CEO [info@cnp-cycles.de](mailto:info@cnp-cycles.de)



**Colsen** (technology in water, energy and environment)  
Contact: Boris Colsen [b.colsen@colsen.nl](mailto:b.colsen@colsen.nl)



**CRPA** (Research Centre on Animal Production, Italy)  
Contact: Sergio Piccinini, Head of Environment Department,  
[s.piccinini@crpa.it](mailto:s.piccinini@crpa.it)



**Culterra** (organic fertilisers, The Netherlands)  
Contact: Leon Fock, Director General [l.fock@culterra.nl](mailto:l.fock@culterra.nl)



**Czech Biogas Association**

Contact: Jan Matějka, Vice-Chairman [jan.matejka@czba.cz](mailto:jan.matejka@czba.cz)



**Czech Pyrolysis and Gasification Association**

Contact: Michael Pohořelý [pohorely@icpf.cas.cz](mailto:pohorely@icpf.cas.cz)



**DAM Depuración de Aguas del Mediterráneo** (wastewater services company Spain)

Contact: Santiago Amores Blasco, Manager Director  
c/o [laura.pastor@dam-aguas.es](mailto:laura.pastor@dam-aguas.es)



**DANVA** (Danish water and wastewater association)

Contact: Helle Kayerød [hkr@danva.dk](mailto:hkr@danva.dk)



**DiaPure AB** (nutrient recycling company, Sweden)

Contact: Lisa Heiberg, [lisa@diapure.eu](mailto:lisa@diapure.eu)



**DOFCO International** (organic fertilisers, The Netherlands)

Contact: M. Vermeulen, J. Uenk (Directors) [j.uenk@dofco.nl](mailto:j.uenk@dofco.nl)



**Dutch Water Authorities (UvW)**

Contact: Albert Vermuë, General Director [avermue@uvw.nl](mailto:avermue@uvw.nl)



**EasyMining Sweden**

(Ash2Phos & CleanMAP processes for P-Recycling)  
Contact: Jan Svärd, CEO [jan.svard@easymining.se](mailto:jan.svard@easymining.se)



**e-BioCenter** University of Milan

Contact: Andrea Schievano [andrea.schievano@unimi.it](mailto:andrea.schievano@unimi.it)



**Ecologic Biogas** (Spain)

Contact: Àngel Porta Gaset [angel@ecobiogas.es](mailto:angel@ecobiogas.es)



**ECon Ewert Consult** (Germany)

Contact: Wolfgang Ewert [w.ewert@ewert-consult.de](mailto:w.ewert@ewert-consult.de)



**EkoBalans** (nutrient recycling company, Sweden)

Contact: Gunnar Thelin, [gunnar.thelin@ekobalans.se](mailto:gunnar.thelin@ekobalans.se)



EKOBALANS

**Eliquo Water** (water technology company)

Contact: Gauke Reitsma, CEO [gauke.reitsma@eliquowater.com](mailto:gauke.reitsma@eliquowater.com)



**Estonian Waterworks Association (EVEL)**

Contact: Pille Aarma [pille.aarma@evel.ee](mailto:pille.aarma@evel.ee)



**EUBIA (European Biomass Industry Association)**

Contact: Drilona Shtjefni, Deputy Secretary General  
[drilona.shtjefni@eubia.org](mailto:drilona.shtjefni@eubia.org)



**European Biochar Foundation**

Contact: Bruno Glaser [bruno.glaser@landw.uni-halle.de](mailto:bruno.glaser@landw.uni-halle.de)

**European Biogas Association (EBA)**

Contact: Franz Kirchmeyr, President [kirchmeyr@european-biogas.eu](mailto:kirchmeyr@european-biogas.eu)

**European Environmental Foundation**

Contact: Stefan Russel, Director for Science and Development  
[stefan\\_russel@sqqw.pl](mailto:stefan_russel@sqqw.pl)

**European Fat Processors and Renderers Association (EFPRA)**

Contact: Martin Alm, Technical Director [mail@dr-alm.eu](mailto:mail@dr-alm.eu)

**European Federation for Agricultural Recycling (EFAR)**

Contact: Hubert Brunet, Chairman [hubert.brunet@sede.fr](mailto:hubert.brunet@sede.fr)

**European Organic Fertilizers Manufacturers Association (EUROFEMA)**

Contact: Leon Fock, Chairman [info@eurofema.eu](mailto:info@eurofema.eu)

**Fachhochschule Nordwestschweiz (FHNW), Switzerland (R&D)**

Contact: Nättorp Anders [anders.naetorp@fhnw.ch](mailto:anders.naetorp@fhnw.ch)

**Fertikal (organic fertilisers, Belgium)**

Contact: Violtje Lebuf, Business Development Engineer Fertikal  
[Violtje.lebuf@fertikal.be](mailto:Violtje.lebuf@fertikal.be)

**FIDER (Fundación para la Innovación y el desarrollo de las energías renovables, Spain)**

Contact: Begoña Martín Rodríguez [bmartin@fundacionfider.org](mailto:bmartin@fundacionfider.org)

**Finnish Biogas Association**

Contact: Anna Virolainen-Hynnä, Executive Director  
[anna.virolainen-hynna@biokaasuyhdistys.net](mailto:anna.virolainen-hynna@biokaasuyhdistys.net)

**Fraunhofer IWKS**

Contact: Carsten Gellermann [carsten.gellermann@isc.fraunhofer.de](mailto:carsten.gellermann@isc.fraunhofer.de)

**FVPK German Biochar Association (Fachverband Pflanzenkohle)**

Contact: Susanne Vesper, Chairperson [Vorstand1@fvpk.de](mailto:Vorstand1@fvpk.de)

**German Biogas Association**

Contact: David Wilken [sebastian.stolpp@biogas.org](mailto:sebastian.stolpp@biogas.org)

**GMB BioEnergie**

(sewage sludge treatment company in The Netherlands)  
Contact: Marc Bennenbroek, project manager  
[marcbennenbroek@gmb.eu](mailto:marcbennenbroek@gmb.eu)

**Hellenic Association of Municipal Water and Sewerage Companies**

Contact: Markos Sklivaniotis, European Affairs [markskliv@gmail.com](mailto:markskliv@gmail.com)





**Hitachi Zosen Corporation** (waste & technology company)  
Contact: Kozo Ueda, Deputy general manager  
[ueda\\_k@hitachizosen.co.jp](mailto:ueda_k@hitachizosen.co.jp)

**Hungarian Biogas Association**  
Contact: Kornel L. Kovacs at [elnok@biogas.hu](mailto:elnok@biogas.hu)

**Hungarian Water Utility Association (MAVIZ)**  
Contact: Edit Nagy, Secretary General [nagy.edit@maviz.org](mailto:nagy.edit@maviz.org)

**Institut für Biogas** (Rostock, Germany)  
Contact: Frank Scholwin [scholwin@biogasundenergie.de](mailto:scholwin@biogasundenergie.de)

**Isle Utilities** (water technologies and services company)  
Contact: Piers Clark Chairman, [piers.clark@isleutilities.com](mailto:piers.clark@isleutilities.com)

**Italian Compost and Biogas Association**  
Contact: Massimo Centemero, General Director [centemero@compost.it](mailto:centemero@compost.it)

**Ithaka Institute for Carbon Strategies** (Germany)  
Contact: Hans-Peter Schmidt, Director [schmidt@ithaka-institut.org](mailto:schmidt@ithaka-institut.org)

**Karlsruher Institut für Technologie (KIT)**  
Kompetenzzentrum für Materialfeuchte (CMM)  
Contact: Rainer Schuhmann [rainer.schuhmann@kit.edu](mailto:rainer.schuhmann@kit.edu)

**Kompetenzzentrum Wasser Berlin (KWB)**  
(water research center Berlin)  
Contact: Ulf Miehe, [ulf.miehe@kompetenz-wasser.de](mailto:ulf.miehe@kompetenz-wasser.de)

**Kopf Syngas** (gasification technology company, Germany)  
Contact: Johannes Judex, Process Engineering and R&D director  
[j.judex@kopf-syngas.de](mailto:j.judex@kopf-syngas.de)

**KWR** (applied research in the water cycle, Netherlands)  
Contact: Idstart Dijkstra, Manager Water Systems and Technology:  
[Idsart.Dijkstra@kwrwater.nl](mailto:Idsart.Dijkstra@kwrwater.nl)

**LeAF** (treatment and valorization of organic residues, The Netherlands)  
Contact: Tiemen Nanninga, Director [tiemen.nanninga@wur.nl](mailto:tiemen.nanninga@wur.nl)

**MasterGas UG** (Development of Biomass Conversion Technology)  
Contact: Björn Kuntze, Managing Director, [kuntze@mastergas.de](mailto:kuntze@mastergas.de)

**MSE Mobile Schlammentwässerungs** (waste technology company, Germany)  
Contact: Rudolf Turek, Technical Manager [r.turek@mse-mobile.de](mailto:r.turek@mse-mobile.de)

**Hitz**  
Hitachi Zosen



**ithaka institute**



**KOMPETENZZENTRUM Wasser Berlin**

**SÜLZLE KOPF**  
SynGas

**KWR**



**MasterGas**  
Die HolzgasCompany

**MSE**

**N2-Applied** (nutrient recovery company, Norway)  
Contact: Henk Aarts, Business Development Director Europe  
[henk.aarts@n2applied.no](mailto:henk.aarts@n2applied.no)

**Naturefund e. V.** (non-profit environmental organisation)  
Contact: Katja Wiese, Director [katja.wiese@naturefund.de](mailto:katja.wiese@naturefund.de)

**NMI nutrient management institute**, (The Netherlands)  
Contact: Laura van Schöll, senior project manager  
[Laura.vanscholl@nmi-agro.nl](mailto:Laura.vanscholl@nmi-agro.nl)

**NORSØK** Norwegian Centre for Organic Agriculture  
Contact: Turid Strøm, director, [turid.strom@norsok.no](mailto:turid.strom@norsok.no)

**OB Impianti** (water & agricultural technology company, Italy)  
Contact: Elena Bonadei [elena.bonadei@obimpianti.com](mailto:elena.bonadei@obimpianti.com)

**Ostara** (nutrient recycling company)  
Contact: Dan Parmar, President & CEO [dparmar@ostara.com](mailto:dparmar@ostara.com)

**Outotec GmbH** (sustainable use of Earth's natural resources)  
Andreas Orth, Vice President Product Management Energy & Environment  
[andreas.orth@outotec.com](mailto:andreas.orth@outotec.com)

**Pflanzkohle Jäger** (energy and biochar, Germany)  
Contact: Wilhelm Jäger [pflanzkohle-jaeger@t-online.de](mailto:pflanzkohle-jaeger@t-online.de)

**P-REX Environment** (technology services, Germany)  
Contact: Christian Kabbe [ckabbe@p-rex.eu](mailto:ckabbe@p-rex.eu)

**Proman Consulting** (Austria)  
Contact: Ludwig Hermann [l.hermann@proman.pro](mailto:l.hermann@proman.pro)

**Prophos Chemicals** (Italy)  
Contact: Vania Manfredi, CEO [v.manfredi@prophoschemicals.com](mailto:v.manfredi@prophoschemicals.com)

**PYREG** (biochar company, Germany)  
Contact: Helmut Gerber, Managing Director [H.Gerber@pyreg.de](mailto:H.Gerber@pyreg.de)

**Rika Biofuel Developments** (waste to biogas developers)  
Contact: Gregory Krupnikovs [info@rikabiofuels.com](mailto:info@rikabiofuels.com)

**RISE – Agrifood and Bioscience** (Research Institutes of Sweden)  
Contact: Erik Sindhøj, Coordinator for Circular Nutrient Systems,  
[erik.sindhoj@ri.se](mailto:erik.sindhoj@ri.se)

**N2 — Applied**



**RITTIMO Agroenvironment** (France)  
Contact: Laure Metzger [Laure.METZGER@rittmo.com](mailto:Laure.METZGER@rittmo.com)



**School of Agronomy, University of Lisbon**  
Contact: Antonio Guerreiro de Brito, President of ISA  
[agbrito@isa.ulisboa.pt](mailto:agbrito@isa.ulisboa.pt)



**sePura** (agricultural and fertiliser services, Germany)  
Contact: Dieter Leimkötter, CEO [dieter.leimkoetter@sePura.de](mailto:dieter.leimkoetter@sePura.de)



**SOCAMEX Spain** (water management)  
Contact: Roberto Torío, Technical Director [yballesterosa@socamex.com](mailto:yballesterosa@socamex.com)



**Soepenberg Group** (recycling specialist, fertilizer and struvite producer)  
Contact: Norbert Scholten, Owner [n.scholten@soepenberg.com](mailto:n.scholten@soepenberg.com)



**SOIL-CONCEPT**  
(energetic use and recycling of sewage sludge compost)  
Contact: Alex Kolomijtschuk [ako@soil-concept.lu](mailto:ako@soil-concept.lu)



**Sonnenerde** (compost and bochar company Germany)  
Contact: Gerald Dunst, [g.dunst@sonnenerde.at](mailto:g.dunst@sonnenerde.at)



**SPD Navarra de Biogás**  
Contact: Javier Martín [bjmartin@spdbiogas.com](mailto:bjmartin@spdbiogas.com)



**Swedish Gas Association**  
Contact: Linus Klackenberg, Production co-ordinator  
[linus.klackenberg@energigas.se](mailto:linus.klackenberg@energigas.se)



**TerraNova Energy** (waste technology company, Germany)  
Contact: Marc Buttman, CEO [marc.buttman@terranova-energy.com](mailto:marc.buttman@terranova-energy.com)



**ValBiom** (Walloon cluster of the Bioeconomy)  
Contact: Bertrand Auquière, Manager [b.auquiere@valbiom.be](mailto:b.auquiere@valbiom.be)



**Waila AB** (climate mitigation solutions, Sweden)  
Contact: Sebastian Meyer, CEO [sebastian.meyer@waila.se](mailto:sebastian.meyer@waila.se)



**Waterstromen** (nutrient recycling company industrial process water)  
Contact: Richard Haarhuis, Project manager  
[R.Haarhuis@Waterstromen.nl](mailto:R.Haarhuis@Waterstromen.nl)



**Wetsus** (European Centre of Excellence for Sustainable Water Technology, The Netherlands)  
Contact: Cees Buisman, Scientific Director [cees.buisman@wetsus.nl](mailto:cees.buisman@wetsus.nl)



**Willem Schipper** (recycling consultancy services, The Netherlands)  
Contact: Willem Schipper [wsconsulting@zeelandnet.nl](mailto:wsconsulting@zeelandnet.nl)

