

15th October 2018

On behalf of the signatory organisations indicated below:

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 15th October 2018) follows

Fertikal (organic fertilisers, Belgium)
Contact: Violtje Lebuf, Business Development Engineer Fertikal
Violtje.lebuf@fertikal.be

European Federation for Agricultural Recycling (EFAR)
Contact : Hubert Brunet, Chairman hubert.brunet@sede.fr

Italian Compost and Biogas Association
Contact: Massimo Centemero, General Director centemero@compost.it

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

European Biogas Association (EBA)
Contact: Franz Kirchmeyr, President kirchmeyr@european-biogas.eu

EkoBalans (nutrient recycling company, Sweden)
Contact: Gunnar Thelin, gunnar.thelin@ekobalans.se

European Fat Processors and Renderers Association (EFPRA)
Contact: Martin Alm, Technical Director mail@dr-alm.eu

European Organic Fertilizers Manufacturers Association (EUROFEMA)
Contact: Leon Fock, Chairman info@eurofema.eu

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

Proman Consulting (Austria)
Contact: Ludwig Hermann l.hermann@proman.pro

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

Fachhochschule Nordwestschweiz (FHNW), Switzerland (R&D)
Contact: Nättorp Anders anders.naetorp@fhnw.ch

DANVA (Danish water and wastewater association)
Contact: Helle Kayerød hkr@danva.dk

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

FVPK German Biochar Association (Fachverband Pflanzenkohle)
Contact: Susanne Veser, Chairperson Vorstand1@fvpk.de

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

FERTIKAL

EFAR



OSTARA

EBA
European Biogas Association



EKOBALANS

EFPRA
EUROFEMA

Culterra

**PRO
MAN**

aarhusvand

n|w University of Applied Sciences and Arts
Northwestern Switzerland

DANVA
PYREG

**FACHVERBAND
PFLANZENKOHLE**

N2 — Applied

School of Agronomy, University of Lisbon
Contact: Antonio Guerreiro de Brito, President of ISA
agbrito@isa.ulisboa.pt



Estonian Waterworks Association (EVEL)
Contact: Pille Aarma pille.aarma@evel.ee



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



European Biochar Foundation
Contact: Bruno Glaser bruno.glaser@landw.uni-halle.de



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



Bulgarian Water Association (BWA)
Contact: Ivan Ivanov, President ivijejan@abv.bg



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



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



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



e-BioCenter University of Milan
Contact: Andrea Schievano andrea.schievano@unimi.it



Dutch Water Authorities (UvW)
Contact: Albert Vermuë, General Director avermue@uvw.nl



Hitachi Zosen Corporation (waste & technology company)
Contact: Kozo Ueda, Deputy general manager
ueda_k@hitachizosen.co.jp



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



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



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



Hellenic Association of Municipal Water and Sewerage Companies
Contact: Markos Sklivaniotis, European Affairs markskliv@gmail.com



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



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



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



EUBIA (European Biomass Industry Association)
Contact: Drilona Shtjefni, Deputy Secretary General
drilona.shtjefni@eubia.org



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



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



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



Eliquo Water (water technology company)
Contact: Gauke Reitsma, CEO gauke.reitsma@eliquowater.com



European Environmental Foundation
Contact: Stefan Russel, Director for Science and Development
stefan_russel@sqqw.pl



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



BioEngine (green process engineering and biorefineries)
Contact: Céline Vaneeckhaute, Director
celine.vaneeckhaute@gch.ulaval.ca



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

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

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

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

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

Bioenergy Europe
Contact: Jean-Marc Jossart, Secretary General,
Jossart@bioenergyeurope.org

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

DiaPure AB (nutrient recycling company, Sweden)
Contact: Lisa Heiberg, lisa@diapure.eu

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

DAM Depuración de Aguas del Mediterráneo (wastewater services company Spain)
Contact: Santiago Amores Blasco, Manager Director
c/o laura.pastor@dam-aguas.es

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

Sonnenerde (compost and boichar company Germany)
Contact: Gerald Dunst, g.dunst@sonnenerde.at

Fertieuropa (complex fertilisers, Spain)
Contact: David S. García, R&D Engineer
david.senen@fertieuropa.com

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

RITTMO Agroenvironment (France)
Contact: Laure Metzger Laure.METZGER@rittmo.com



